

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V**

**DATE:** MAR 31 1992

**SUBJECT:** IWI Industries  
Non-notifier

**FROM:** Joseph M. Boyle, Chief and Karl E. Bremer, Chief  
RCRA Enforcement Branch RCRA Permitting Branch

**TO:** Sally K. Swanson, Chief  
RCRA Program Management Branch

Please add IWI Industries to the Land Disposal Universe. The Illinois Environmental Protection Agency (IEPA) has been notified of this addition in a letter to Mr. William C. Child. Facts that support the position assumed by the United States Environmental Protection Agency (U.S. EPA) are as follows:

1) The facility manufactures tank spray nozzles, tank and drum washers and bulk liquid shipping tanks. Damaged tanks are also repaired at the facility after removing the paint residues by cleaning. The liquid rinse and the sludge generated during cleaning operations are stored in above-ground tanks. According to IEPA, the facility also places sludge on waste piles on the floor inside the building. The waste piles occupy several entire rooms and the waste is poorly contained as it reaches the window sills. IEPA has sampled and analyzed the sludge from the waste piles. The results have indicated that the sludge contains the hazardous wastes F002, F003, F005, D006, D007, and D008.

2) The facility has not given notification to U.S. EPA for its hazardous waste management activities. Therefore, the date the waste piles were created has not been documented. However, there is evidence that waste has been added to the waste piles after August 2, 1984, which is the date the waste piles were initially documented.

If you have any questions about this issue, please contact Ms. Mirtha Capiro of my staff at 886-7567.

cc: S. Sylvester

OFFICIAL FILE COPY

*APB 3/31/92*

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI IL EPS RBB CHIEF Section	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
<i>MC</i>	<i>3-31-92</i>	<i>CS</i> <i>3/31</i>			<i>YH</i> <i>4/2/92</i>		<i>JMB</i> <i>3/31/92</i>		



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1) The facility manufactures tank spray nozzles, tank and drum washers and bulk liquid shipping tanks. Damaged tanks are also repaired at the facility after removing the paint residues by cleaning. The liquid rinse and the semi-sludge portion generated during cleaning operations are stored in underground tanks. The remaining sludge portion is placed in waste piles inside the building.

2) IEPA has sampled and analyzed the sludge from containers and waste piles. The results obtained have revealed the presence of non-halogenated organic solvents and of metal contents above EP toxicity limits (prior to June 29, 1990). As of February 3, 1992, the facility has not given notification to U.S. EPA for its activities of generation, storage and disposal of hazardous waste.

If you have any questions about this issue, please contact Mirtha Capiro of my staff at 886-7567.

HRE-8J/MC/be/6-7567/Filename-IWI.MM

OFFICIAL FILE COPY

*ap 2/5/92*

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
<i>MC</i>	<i>2/4/92</i>	<i>2/4/92</i>							





**Illinois Environmental Protection Agency**  
**Division of Land Pollution Control**

# RCRA INSPECTION REPORT

US A #: 1L D097179204 | EPA #: 0311740003  
 Facility Name: 1w1 Industries | Phone #: 708-458-8700  
 Street Address: 7738 West 61st Place | County: Cook  
 City: Summit | State: IL | Zip: 60501  
 Region: 2 | Inspection Date: 11/24/92 | From: 930 To: 1200  
 Weather: 45° Cloudy

**TYPE OF FACILITY**

Notified As: non-notifier (D) | Regulated As: G/SD  
LDF? Y HPV? N | 90-Day F/U Required?: YES ✓ NO

**TYPE OF INSPECTION**

CE: ☒ Sampling: ☐ Citizen Complaint: ☐ Closed: ☐ Other: ☐  
DME/O&M: ☐ Record Review: ☐ Follow-Up to Inspection of: ☐ Withdrawal: ☐

**NON-REGULATED STATUS** N/A

SCG: \_\_\_\_\_ Claimed Nonhandler: \_\_\_\_\_ Other (Specify in Narrative): \_\_\_\_\_

**PART A** N/A

Notification Date: \_\_\_/\_\_\_/\_\_\_, from (initial) or (subsequent) Notification.

Initial Part A Date: \_\_\_/\_\_\_/\_\_\_ Amended: \_\_\_/\_\_\_/\_\_\_  
Part A Withdrawal requested: \_\_\_/\_\_\_/\_\_\_ Approved by (US)(IL) EPA: \_\_\_/\_\_\_/\_\_\_

**PART B PERMIT APPLICATION**

Part B Permit Submitted: Y or N      /      /      Final Permit Issued:      /      /     

## ENFORCEMENT

as the firm been referred to - USEPA: Y or (N)    /    /     
 inos Attorney General: (Y) or N   8/19/85   County State's Attorney: (Y) or N   5/30/85  

## ORDERS ISSUED

CACO: \_\_\_/\_\_\_/\_\_\_ CAFO: \_\_\_/\_\_\_/\_\_\_ Consent Decree: \_\_\_/\_\_\_/\_\_\_  
 Federal Court Order: \_\_\_/\_\_\_/\_\_\_ State Court Order: 11/8/10<sup>19</sup> 185<sup>85</sup> IPCB Order: \_\_\_/\_\_\_/\_\_\_

**TSO FACILITY ACTIVITY SUMMARY**

Activity by Process Code	On Part A2	Activity Conducted Prior to 1987	Was Activity Ever Done?	Closed	Being done at Time of Insp?	Exempt per 35 IAC. Sec.	On Annual Report		
							19	19	19
S01	non filer	?	Y	N	Y	N/A	not	subm	itted
S02	↓	↓	↓	↓	↓	↓	7		7
S04	↓	↓	↓	↓	N	↓			
				RECEIVED		RECEIVED			
				23 DEC 1992		10 DEC 1992			
				IEPA/DLPC		IEPA/DLPC			

# SUMMARY OF APPARENT VIOLATIONS

## OWNER

## OPERATOR

Name Glenn Wellman  
 Address 7738 W. 61st Place  
 City Summit  
 State IL Zip 60501  
 Phone # 708-458-8700

Name LWI Industries  
 Address - Same -  
 City \_\_\_\_\_  
 State \_\_\_\_\_ Zip \_\_\_\_\_  
 Phone # \_\_\_\_\_

## PERSON(S) INTERVIEWED

## TITLE

## PHONE #

Dan Ehrler Production Foreman 708-458-8700

## INSPECTION PARTICIPANT(S)

## AGENCY/TITLE

## PHONE #

Tina Kovaszny EPA - EPS 708-531-5900  
Gino Brun ↓ ↓

## PREPARED BY

## AGENCY/TITLE

## PHONE #

Tina Kovaszny - same -

Area	Class	Section
GGR	1	722.111
May be applicable based on the waste determination		
GGR	1	722.112(a)
GPT		722.134(a)
DMC	1	(725.271)
DMC	1	(725.273(a))
DMC	1	(725.273(b))
DMC	2	(725.274)
DTR	1	(725.291(a))
DTR	1	(725.293(a))
DTR	1	(725.294)

Area	Class	Section
DTR	2	(725.295(a))
DTR	1	(725.296)
DTR	1	(725.296(d))
DPP	1	(725.131)
DPP	1	(725.132)
DPP	1	(725.134)
DPP	1	(725.135)
DPP	2	(725.137)
DCP	1	(725.151(a))
DCP	2	(725.155)
DCP	1	(725.156(a-b))

Area	Class	Section
DGS	2	(725.116(d))
DOR	1	703.150(a)
DGS	1	725.111
DGS	1	725.113(a)
DGS	1	725.113(b)
DGS	1	725.114(c)
DGS	2	725.115(a)
DGS	2	725.115(b)
DGS	2	725.115(c)
DGS	2	725.115(d)
DGS	1	725.116(a)

## SUMMARY OF VIOLATIONS - CONTINUED

Area	Class	Section
PP	1	725.131
PP	1	725.132
P	1	725.134
PP	1	725.135
PP	2	725.137
CP	1	725.151(a)
CP	2	725.155
CP	1	725.156(a-1)
NR	2	725.173
AR	2	725.174(a)
IR	2	725.175
IR	1	725.176

Area	Class	Section
DMR	2	725.177
DRL	1	725.212(a)
DER	1	725.242(a)
DMC	1	725.271
DMC	1	725.273(a)
DMC	1	725.273(b)
DMC	2	725.274
DTR	1	725.291(a)
DTR	1	725.293(a)
DTR	1	725.294
DTR	2	725.295(a)
DTR	2	725.295(c)

[illegible]



IWI Industries  
0311740003 - ILD097179204  
November 25, 1992

## NARRATIVE

IWI Industries manufactures and repairs portable tote tanks. According to Glen Wellman, owner, IWI no longer cleans out used tanks. The tanks are cleaned out before arriving at IWI. According to Mr. Wellman, and Dan Ehrler, Production Foreman, there is no hazardous waste generated, stored, or disposed of on-site. During the inspection, it was discovered that IWI is storing a very large amount of material on-site. Mr. Wellman and Mr. Ehrler claim that the material on-site is not hazardous and can be used in the future. The following is an inventory of material found on-site. Because of the condition of the site, this inventory is not exact.

### Building P

- 1) 81 drums labeled "grease" (photos 1 & 3).
- 2) Empty totes (photos 2, 4, & 5).
- 3) Area along north wall saturated with what appears to be grease and/or oil (photos 6, 7, 8, 11, & 12).

### Building G

Burned out building used to store what appears to be paint waste. This material is approximately 2-3 feet deep and is stored on the floor of the building. This building has holes in the south wall, which is allowing the material to migrate into building P (photos 9, & 10).

### Building H

No evidence of waste in this building.

### Building F

Burned out building used to store what appears to be paint waste. This material is approximately 2-3 feet deep and is stored on the floor of the building. This building has an opening on the west wall which appears to have been used to dump the waste into the building (photos 13, 14, 15, 16, & 17).

### Building L

No evidence of waste in this building.

### Building D

No evidence of waste in this building.





#### Building S

Numerous totes filled with "grease". Location of former process area where totes were emptied and cleaned out. Tank is currently filled with what appears to be paint waste (photos 20, 46, & 47).

#### Building A

Approximately 50 totes - contents unknown. Approximately 300 drums containing various materials. Approximately 35-5 gallon pails filled with what appears to be paint waste. Sump located along north wall with a pipe leading to it - filled with unknown liquid material (photos 21, 22, 23, 24, 37, 38, 39, 40, 41, 42, 43, 44, & 45). The majority of the drums in this area are in very poor condition, and left open.

#### Building O

Approximately 15 totes and 54 drums filled with unknown material.

#### Building N

2 drums of hydrofluoric acid, and 2 drums of paint waste (according to Mr. Ehrler) (photo 48).

#### Building M

Area where production occurs. Storage of finished totes (photo 31). Old Nozzle Test Cabinet (photo 29). Pipe leading from building to east ditch (photo 31 & 32).

#### Outside Areas

Tote filled with grease located west of building S (photo 18).

Tank filled with unknown material (photo 19).

Paint waste located in northeast corner of courtyard (photo 36).

East Drain containing red sludge and liquid. Drain leads to sanitary sewer on-site. Newly painted totes inside building M appear to be the same color as the sludge and liquid found in the drain and in the sewer. This material appears to have entered the drain at the north end of the facility. No pipes or drains appear to lead into the ditch (photos 25, 26, 27, 28, 32,, 33, 34, & 35).



## Hazardous Waste Units

The following areas will be storage areas if the material on-site is found to be hazardous.

S01 - Container Storage Areas

Building P: southwest corner - 76 drums  
center of building - approximately 5 drums  
Building S: against west wall - totes fill with "grease"  
Building A: entire building - >50 totes, >300 drums, >35 pails  
Building O: southwest corner - >15 totes  
along north wall - 54 drums  
Building N: south section of building - 2 drums hydrofluoric acid, 2  
drums paint waste  
Outside Building G/F: west side of building - container with unknown  
material  
Outside Building S: west side of building - tote filled with  
"grease", dumpster filled with an unknown  
material and general refuse  
Outside Building O: northeast corner of courtyard - 1 drum of paint  
waste

S02 - Tank Storage

Building G/F: Entire building has been considered a tank  
Approximately 2-3 feet of waste covering floor

Outside Building G: Black tank containing unknown material

Building S: Former process area - tank formerly used to clean out  
totes brought in from off-site

S04 - Surface Impoundment

Ditch located on the west side of the facility which contained waste. Soil was excavated from this area sometime in the past, but the location of the excavated material is unknown. Closure has not been conducted on this area.

## Additional Notes

A red material has been released into the east ditch which leads to a sewer. A sample of this material was collected from the ditch, at the point closest to the discharge to the sanitary sewer on-site. See attached sampling inspection report.

Area along north wall of Building P is saturated with grease or oil. A waste determination must also be made on this material.

## Apparent Violations

722.111 - IWI must make a waste determination on any materials which appear to be waste.



The following violations may be applicable based on the waste determination:

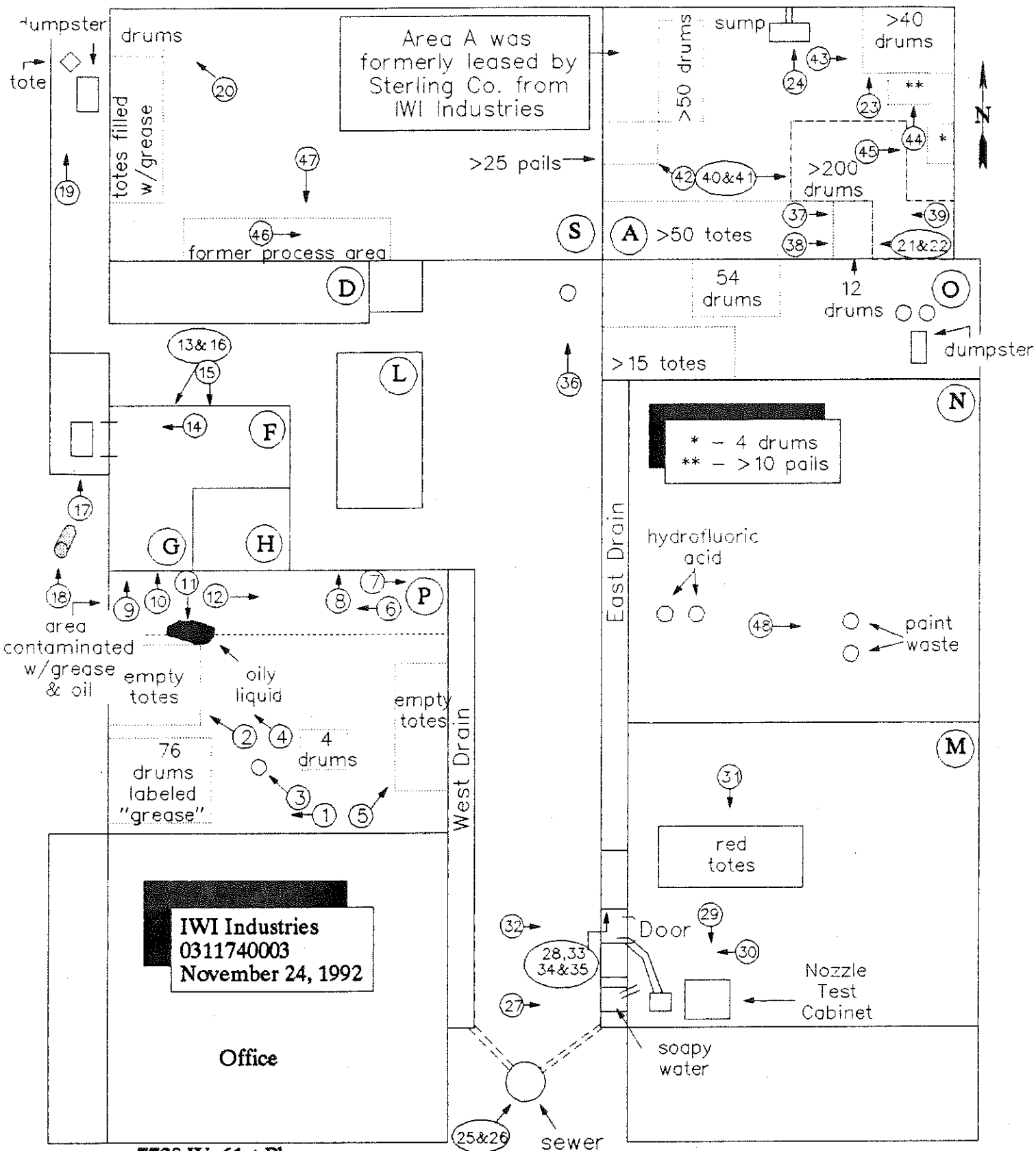
- 722.112(a) - Generator has not obtained a USEPA ID # (no 8700-12 form submitted)
- 722.134(a) - Have not complied with Part 725, Subpart I&J (no dates, labels, etc.)
  - (725.271) - Containers are in bad condition and are leaking
  - (725.273(a)) - Containers must always be closed during storage
  - (725.273(b)) - Containers are stored and handled in a manner which may cause the containers to rupture or leak
  - (725.274) - No inspections of containers are being conducted
  - (725.291(a)) - No independent, certified, written assessments of tanks is available
  - (725.193(a)) - No secondary containment has been provided for the three tanks on-site
  - (725.294) - No spill prevention controls on tanks
  - (725.295(a)) - No tank inspections are being conducted
  - \* (725.295(c)) - No documentation of inspections in operating record
  - (725.296) - Tanks which have had leaks or spills must be removed from service immediately
  - (725.296(d)) - Releases were not reported to the Agency
  - (725.131) - Facility is not maintained to minimize the possibility of releases of hazardous waste to the environment
  - (725.132) - No required equipment: internal, external alarms or communication devises, fire, spill, or decontamination equipment
  - (725.134) - No immediate access to alarm or emergency communication devise
  - (725.135) - Inadequate aisle space
  - (725.137) - No arrangements with local authorities
  - (725.151(a)) - No contingency plan
  - (725.155) - No emergency coordinator
  - (725.156(a-h)) - No action taken upon release of waste
  - (725.116(a)) - No personnel training
  - (725.116(d)) - No documentation of personnel training
- 702.150(a) - No Part A submitted
- 725.111 - Facility owner must apply for a USEPA ID # (no 8700-12 form submitted)
- 725.113(a) - No waste analysis provided before storage
- 725.113(b) - No written waste analysis plan
- 725.114(c) - No "Danger-Unauthorized Personnel Keep Out" sign posted near storage areas
- 725.115(a) - No inspections being conducted
- 725.115(b) - No written inspection schedule
- 725.115(c) - No remediation of deteriorations
- 725.115(d) - No inspection log or summary
- 725.116(a) - No personnel training
- 725.116(d) - No documentation of personnel training
- 725.131 - Facility is not maintained to minimize the possibility of releases of hazardous waste to the environment





- 725.132 - No required equipment: internal or external alarms or communication devises, fire, spill, or decontamination equipment
- 725.134 - No immediate access to alarm or emergency communication devise
- 725.135 - Inadequate aisle space
- 725.137 - No arrangements with local authorities
- 725.151(a) - No contingency plan
- 725.155 - No emergency coordinator
- 725.156(a-h) - No action taken upon release of waste
- 725.173 - No operating record
- 725.174(a) - No records were available at the time of the inspection
- 725.175 - No facility annual reports have been submitted
- 725.176 - Accepted hazardous waste without a manifest (no unmanifested waste report filed)
- 725.177 - No reports regarding releases have been submitted to the Agency
- 725.212(a) - No closure plan
- 725.242(a) - No written closure cost estimate
- 725.271 - Containers are in bad condition and are leaking
- 725.273(a) - Containers must always be closed during storage
- 725.273(b) - Containers are stored and handled in a manner which may cause containers to rupture or leak
- 725.274 - No inspections of containers are being conducted
- 725.291(a) - No independent, certified, written assessment of tanks is available
- 725.293(a) - No secondary containment has been provided for the three tanks on-site
- 725.294 - No spill prevention controls on tanks
- 725.295(a) - No tank inspections are being conducted
- 725.295(c) - No documentation of inspections in operating record
- 725.296 - Tanks which have had leaks or spills must be removed from service immediately
- 725.296(d) - Releases were not reported to the Agency
- 728.107(a) - Generator has not tested his waste to determine if it is restricted from land disposal
- 728.150(a)(1) - Storage of LDR waste not necessary to facilitate proper disposal
- 728.150(a)(2) - Storage containers and tanks are not marked with contents and accumulation dates
- 728.150(c) - Storing LDR waste for greater than a year--not necessary for proper disposal





7738 W. 61st Pl.

61st Place

Not to scale



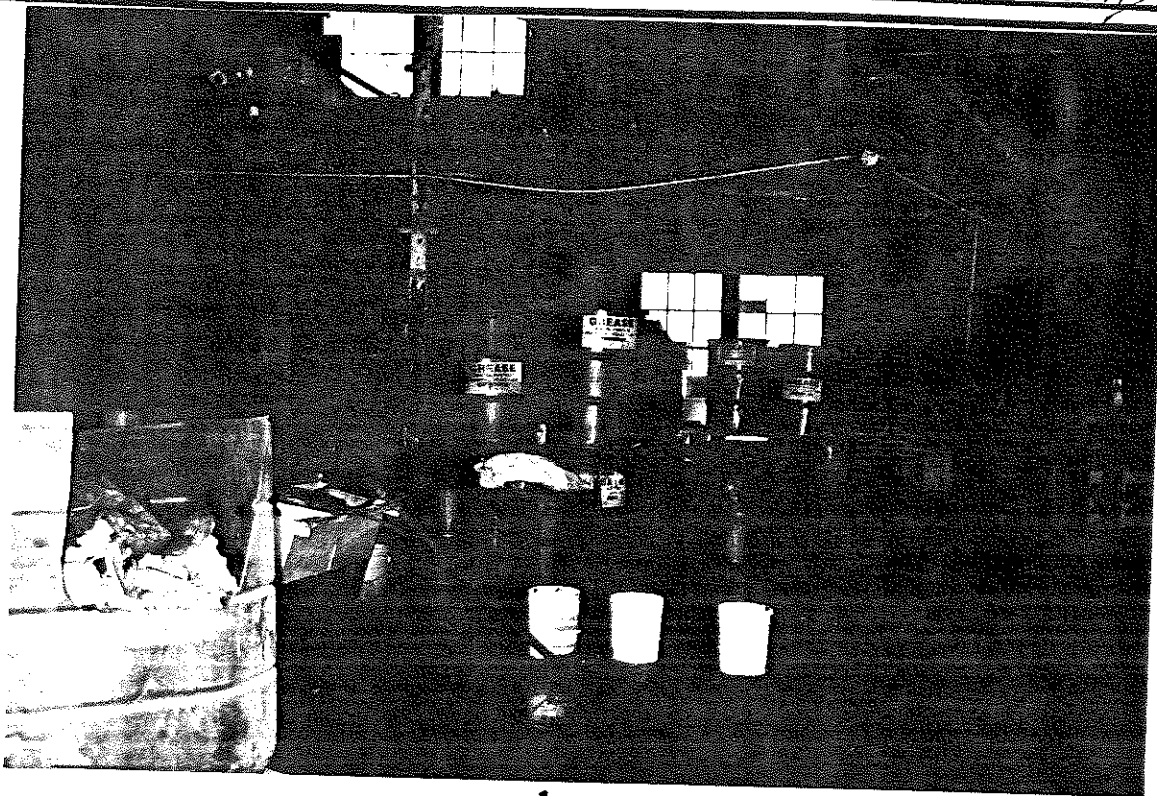
Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

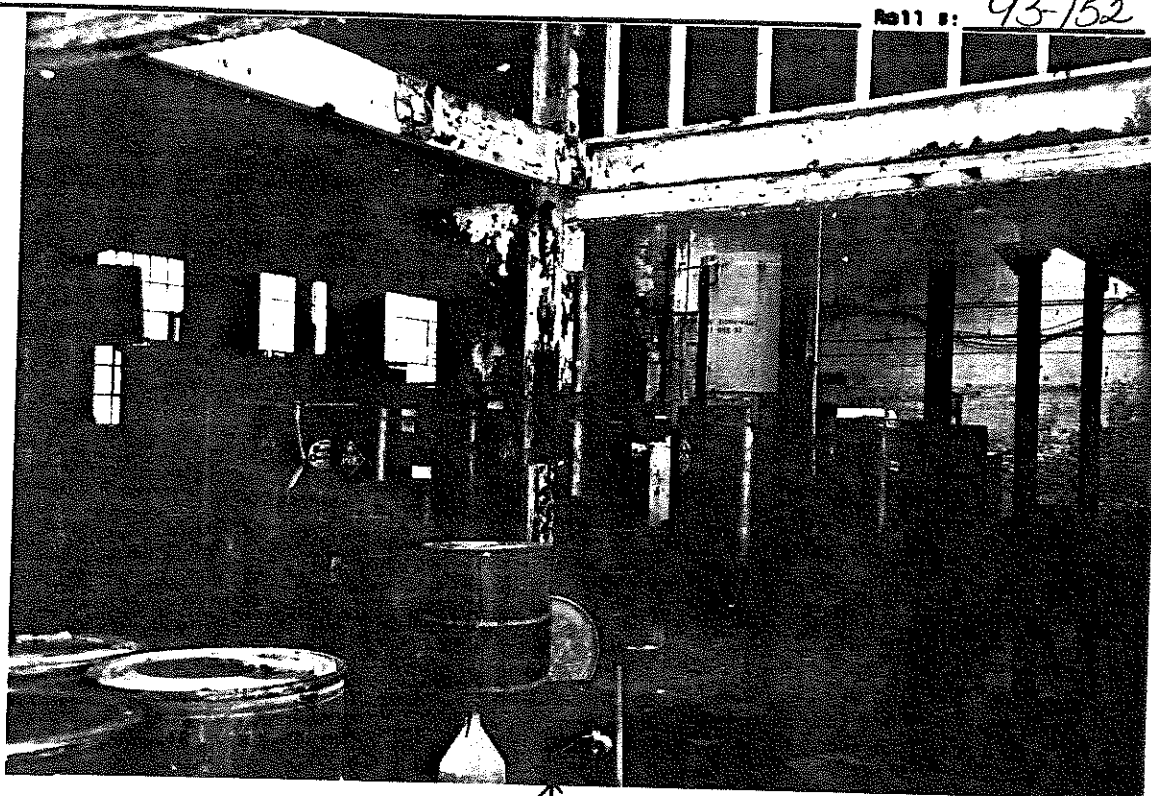
Site #: 0311740003

Date: 11-24-92 Time: 930 - 1200

Photograph by: Gino Bruni



Comments: Drums labeled "grease". ↑  
W Building P



Roll #: 93-152

Page: 61

Comments: Empty vats and drums of grease. ↑  
NW Building P





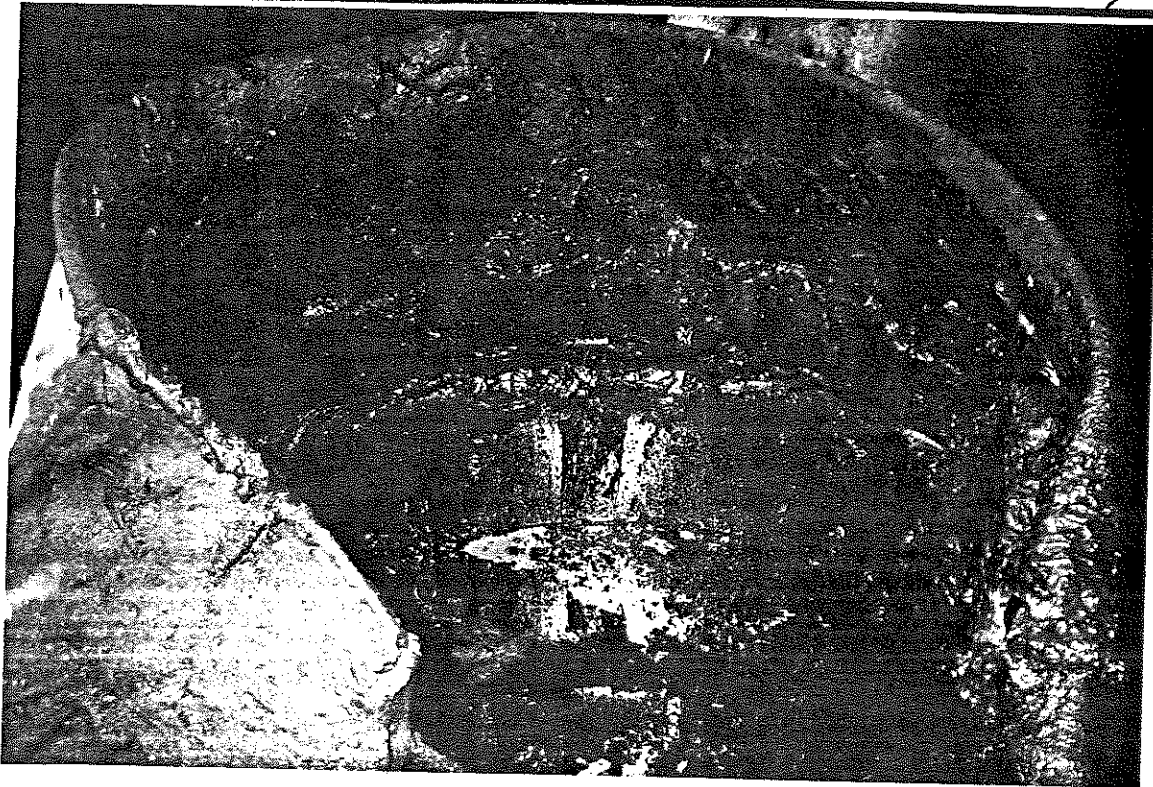
Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

Site #: 0311740003

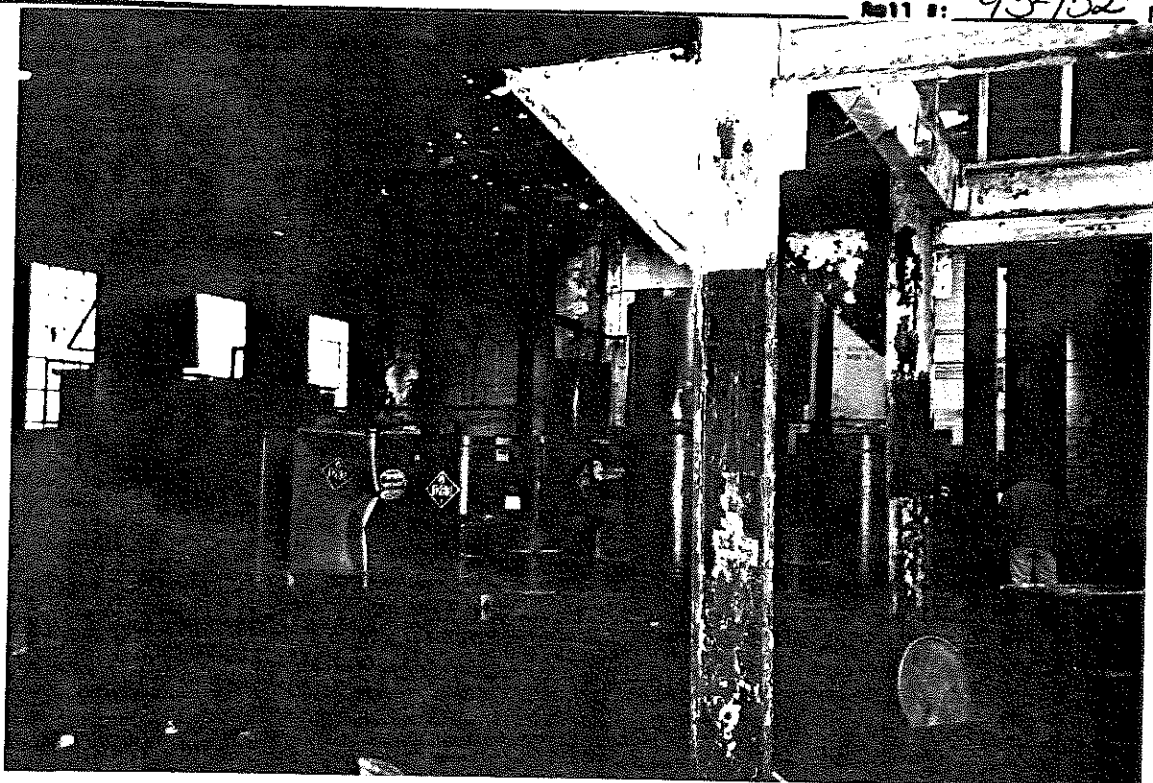
Date: 11-24-92 Time: 930 - 1200

Photographer by: Gino Bruni



Comments: Drum identified as grease <sup>NW</sup> Building P

Roll #: 93-152 Photo #: 3



Comments: Empty drums vats and drums of grease <sup>NW</sup> Building P

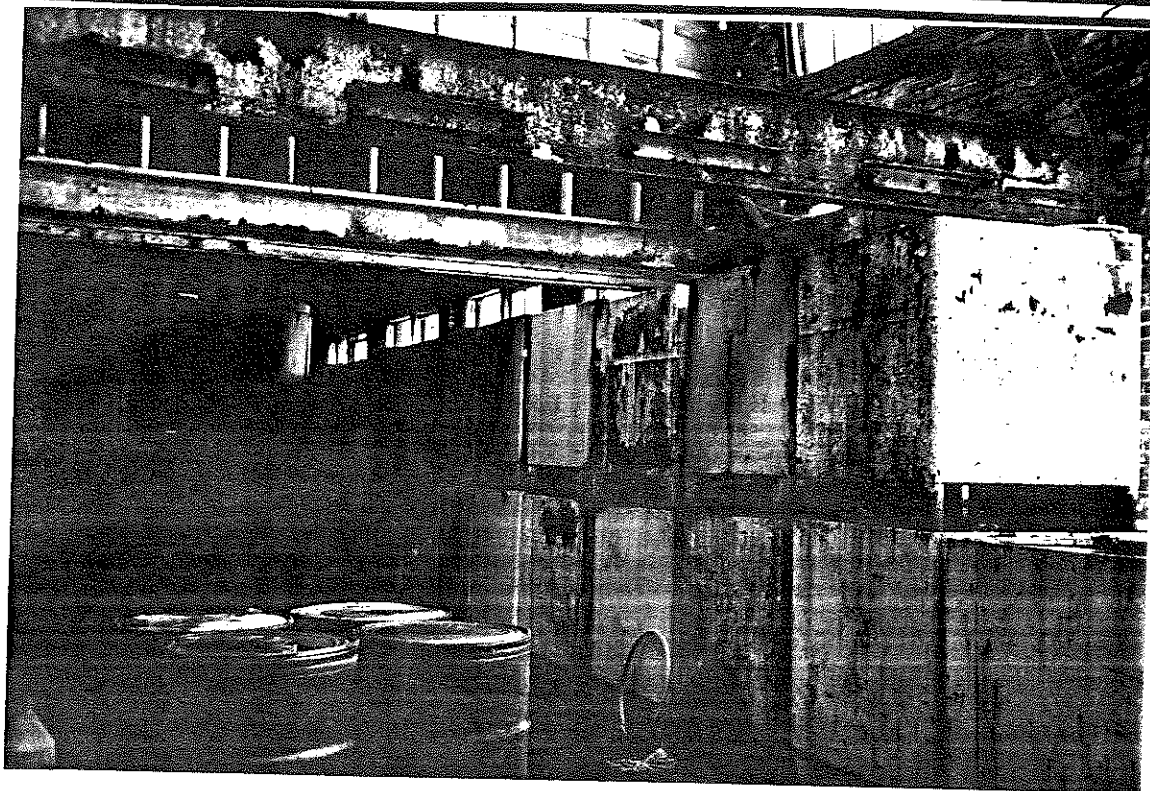


Site Name: IWI Industries

Site #: 0311740003

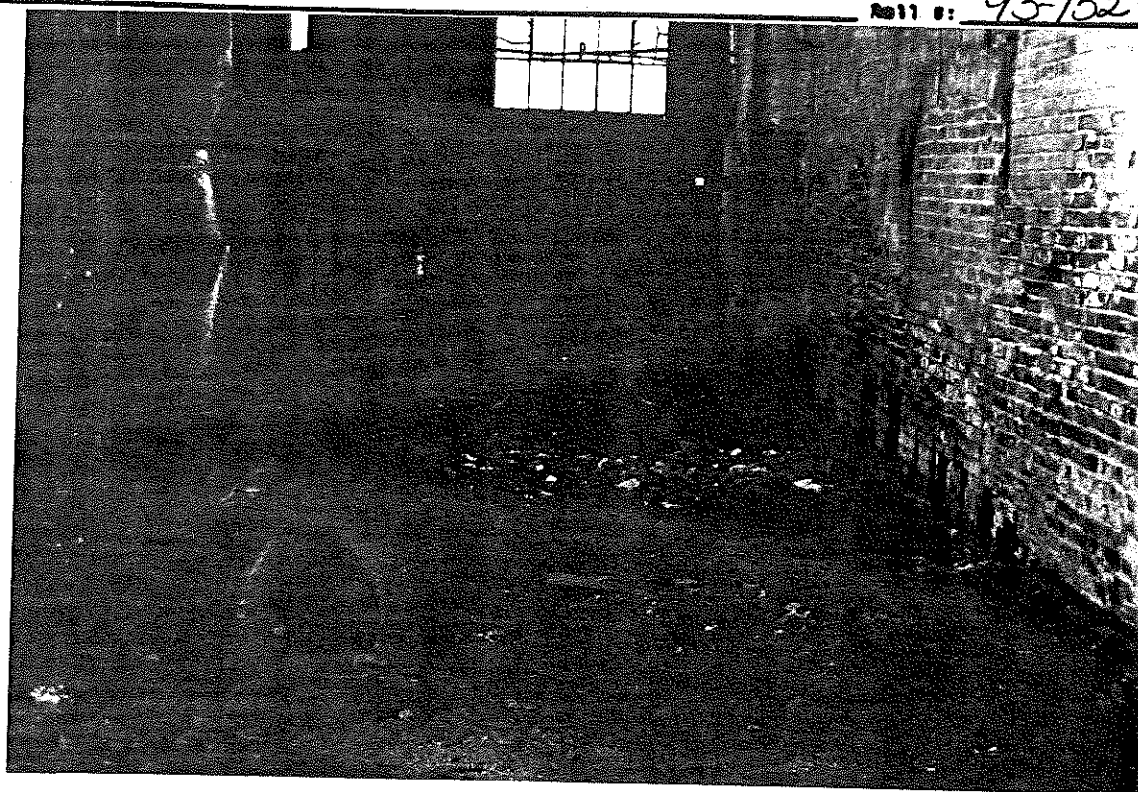
Date: 11-24-92 Time: 930 - 12<sup>00</sup>

Photographer by: Gino Brunj *GB*



Comments: Empty totes. East wall <sup>↑</sup> NE. of Building P.

Roll #: 93-152 Photo #: 5



Comments: Along north wall of <sup>↑</sup> W Building P.



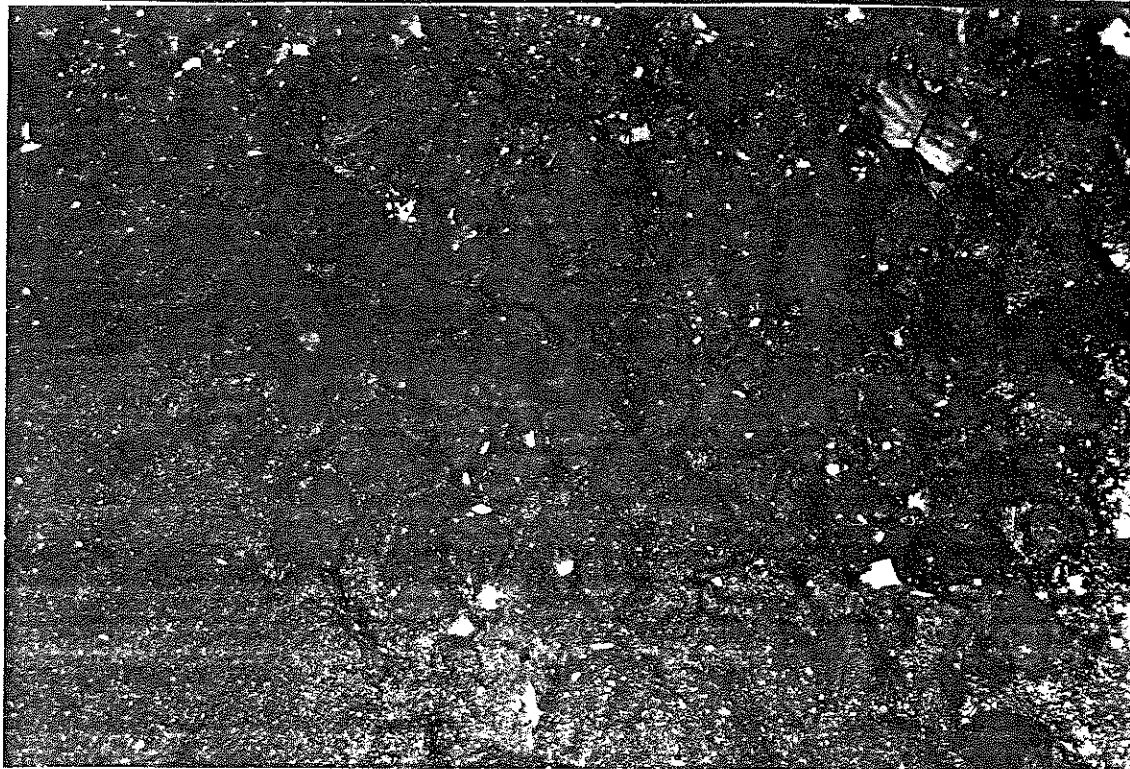
Illinois Environmental Protection Agency Photographs

Site Name: IWI Industries

Site #: 0311740003

Date: 11-24-92 Time: 930 - 12<sup>00</sup>

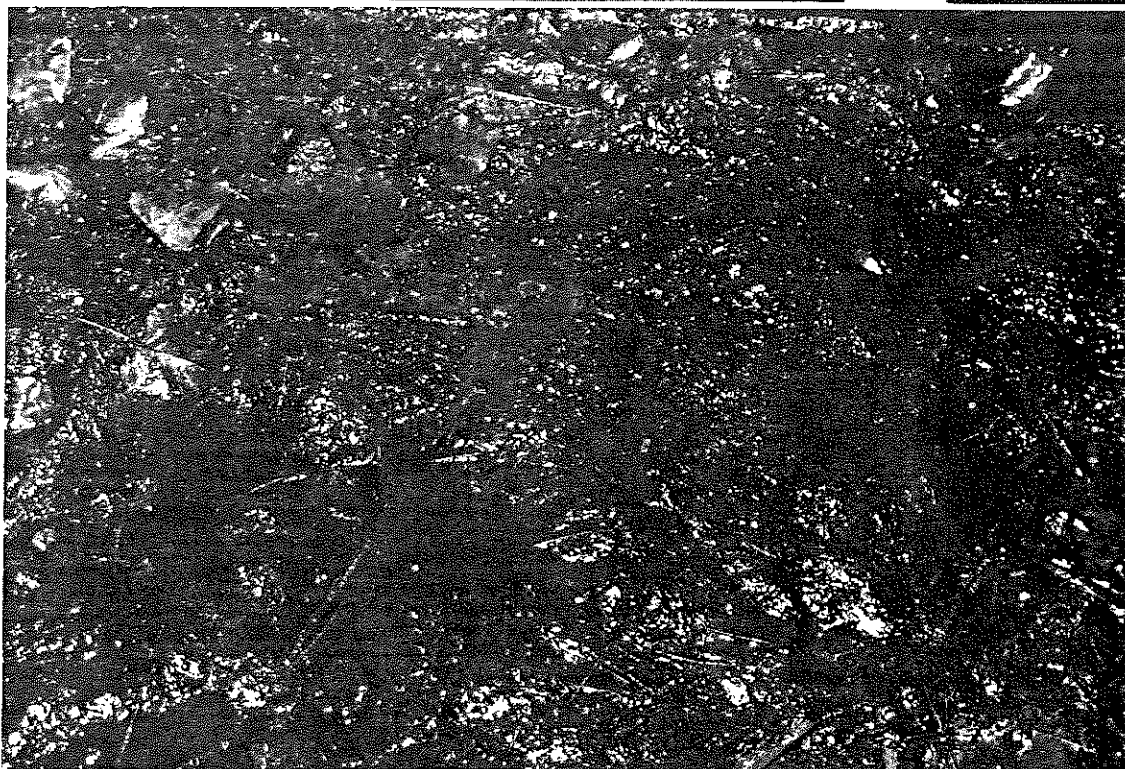
Photograph by: Gino Bruni *GB*



↑  
E

Comments: NE corner of Building P. Contamination of stone on ground

Roll #: 93-152 Photo #: 7



↑  
N

Comments: NE corner of Building P. Contamination of stone on ground

93-152





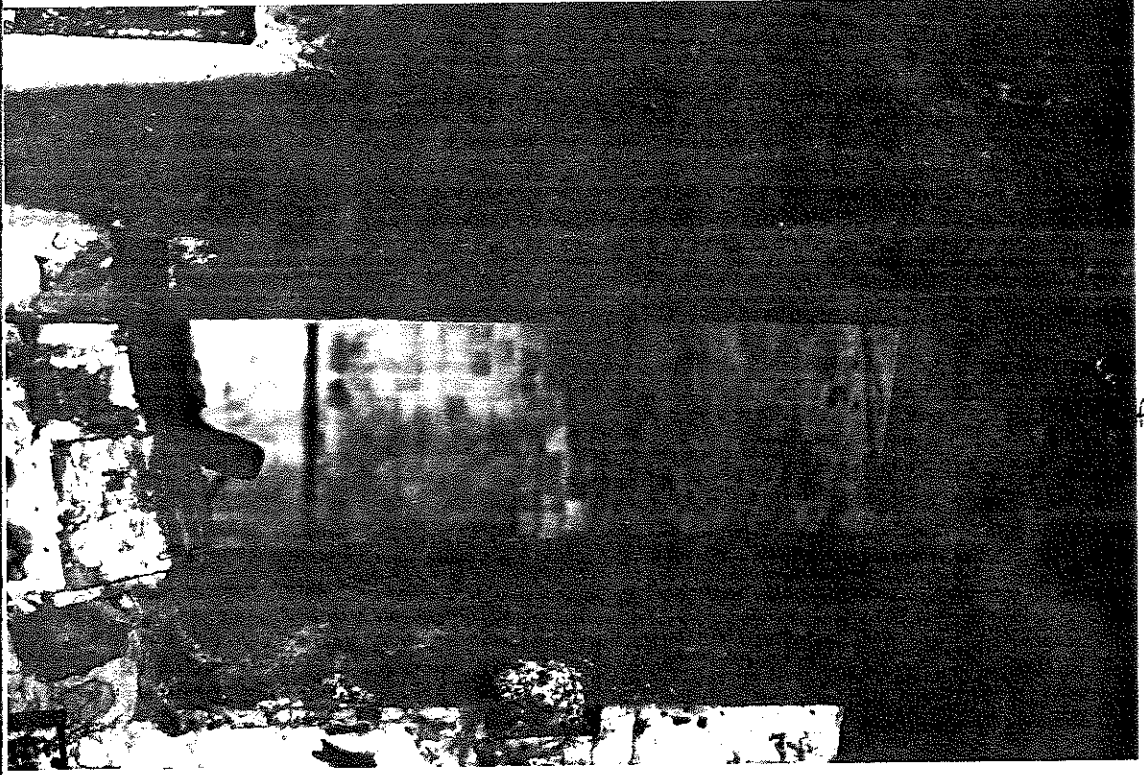
Illinois Environmental Protection Agency Photographs

Site Name: 1W1 Industries

IEPA #: 0311740003

Date: 11-24-92 Time: 9:30-12:00

Photograph By: Gino Bruni



Comments: View into Building & Grain Elevator. Approximately 2 feet

02/15/93



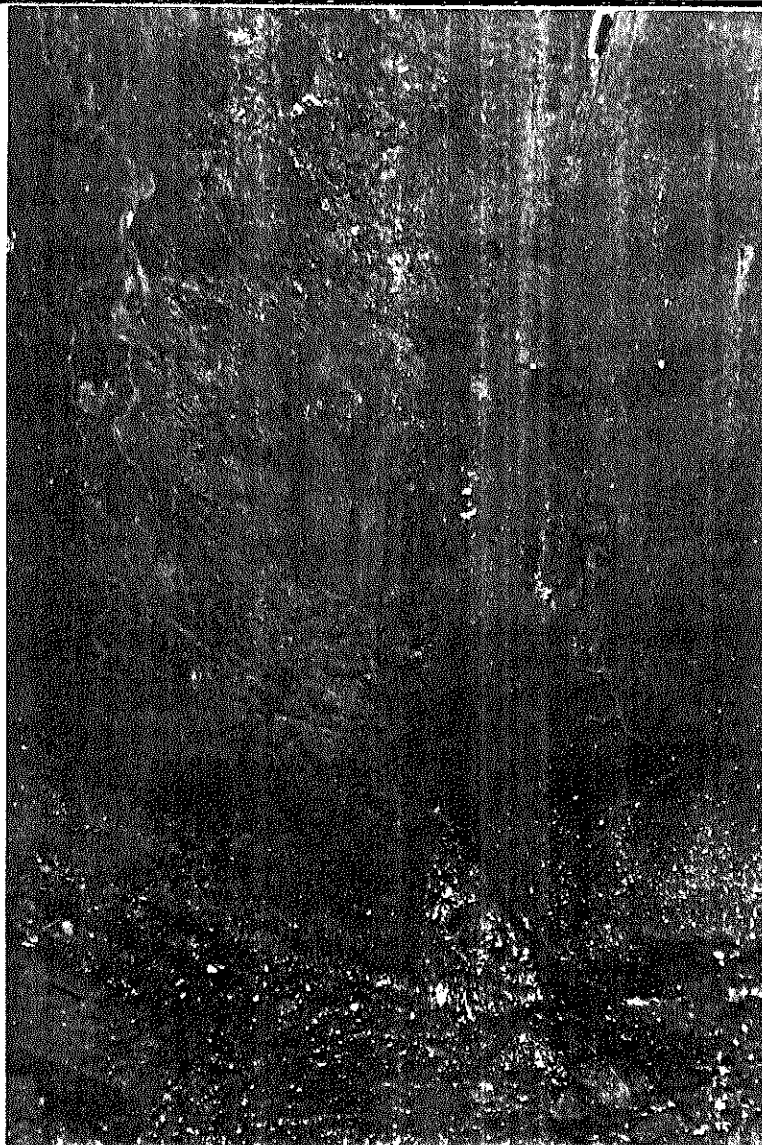
Illinois Environmental Protection Agency Photographs

Site Name: IWI Industries

IEPA #: 0311740003

Date: 11-24-92 Time: 9:30 12:00

Photograph By: Gino Bruni



Comments: Material from Building G migrating into Building P.

03-152



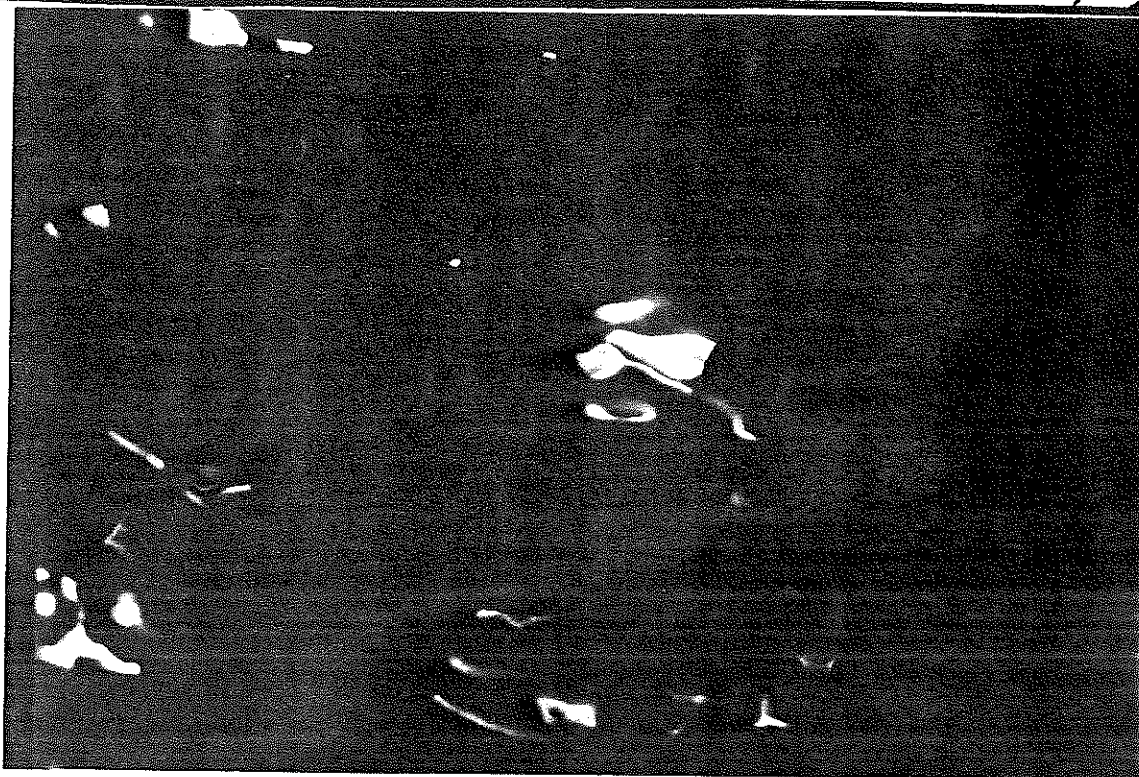
Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

Site #: 0311740003

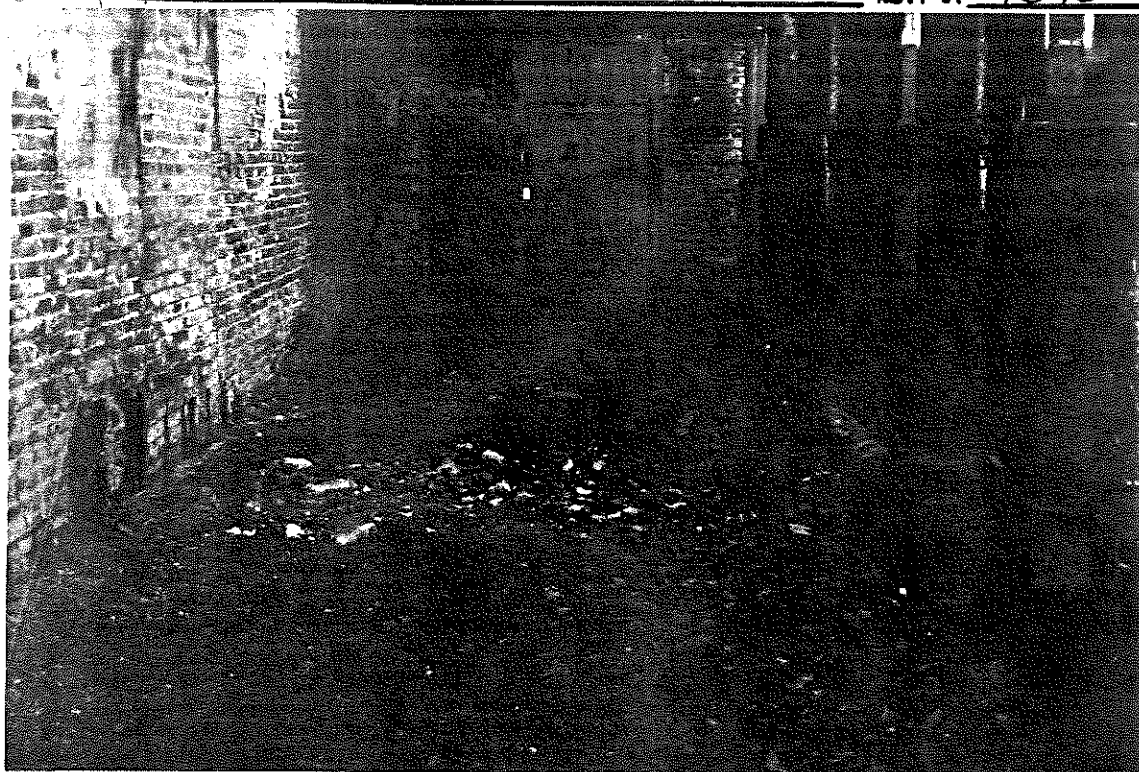
Date: 11-24-92 Time: 9:30 - 12:00

Photograph by: Gino Bruni



Comments: Liquid pooling along south side of gravel area to Building P.

Roll #: 93-152 Photo #: 11



Comments: Along north wall of Building P.

93-152



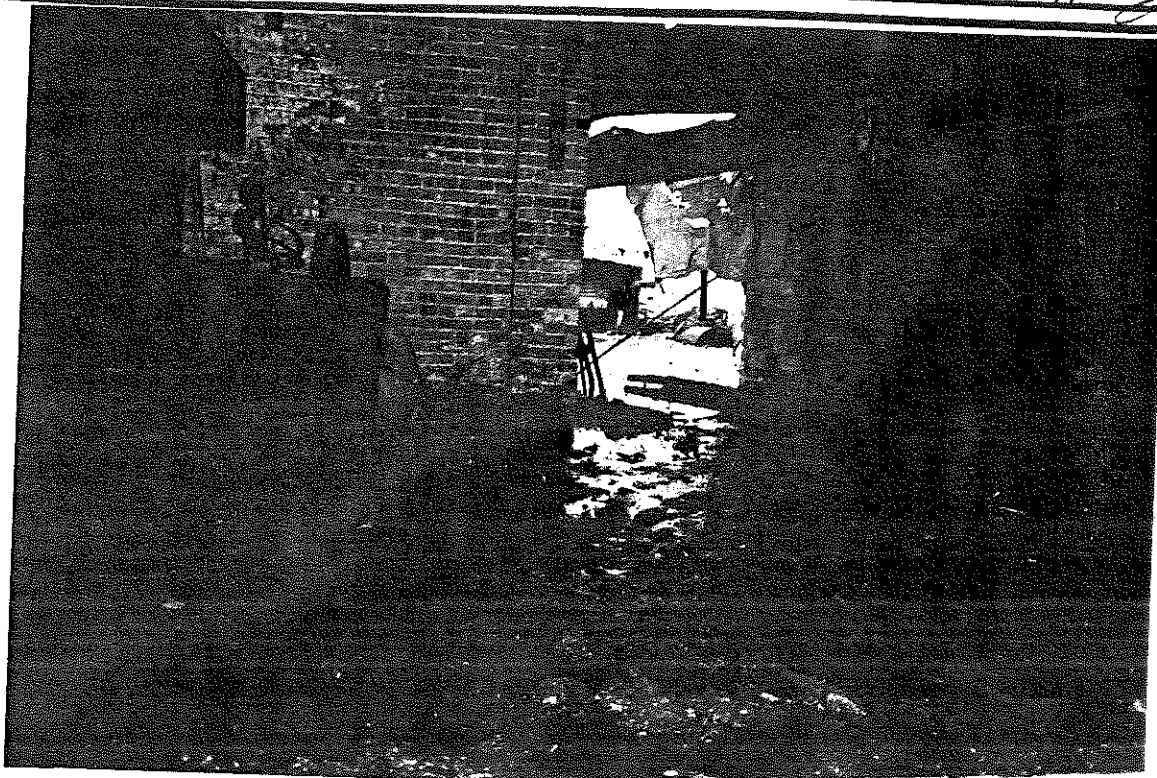
Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

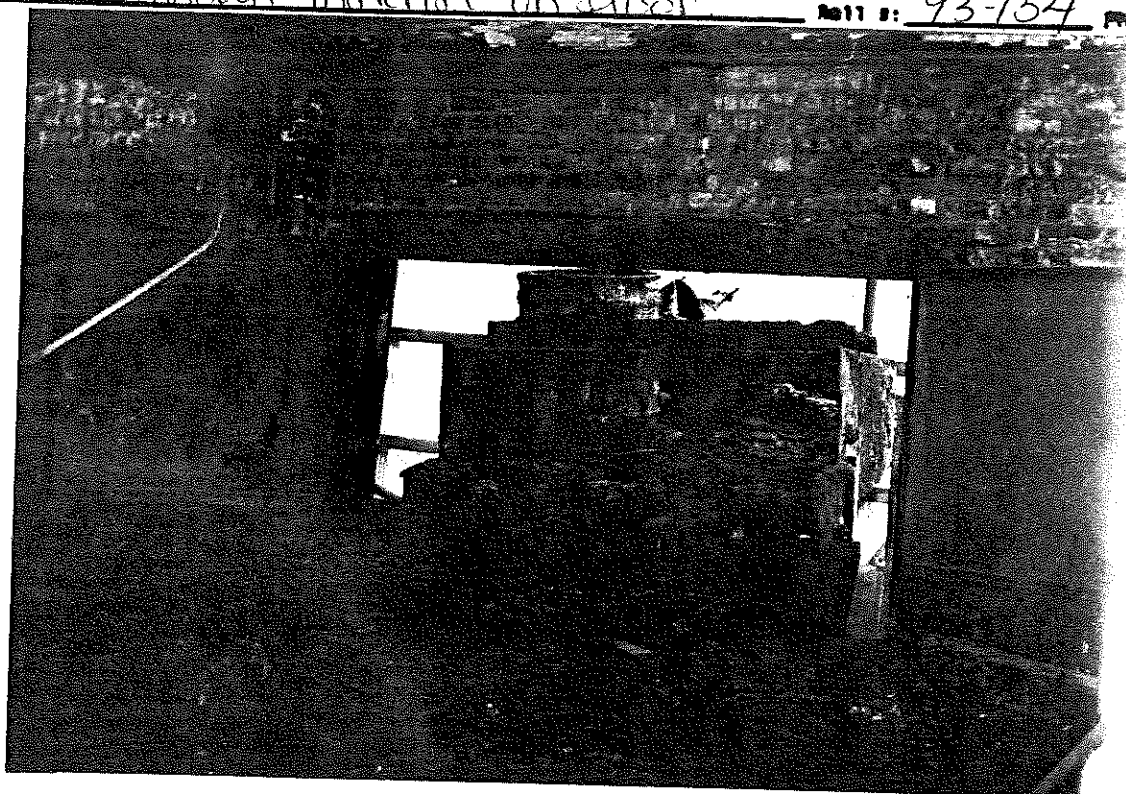
Site #: 0311740003

Date: 11-24-92 Time: 930 - 12<sup>00</sup>

Photograph by: Gino Bruni *JB*



Comments: <sup>↑</sup> SW Foreground, Building F, Background, Building G. Approximate  
2 feet of unknown material on floor. Roll #: 93-154 Page #: 13



Comments: <sup>↑</sup> Inside Building F. Unknown material on floor.





Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

Site #: 0311740003

Date: 11-24-92 Time: 9:30 - 12:00

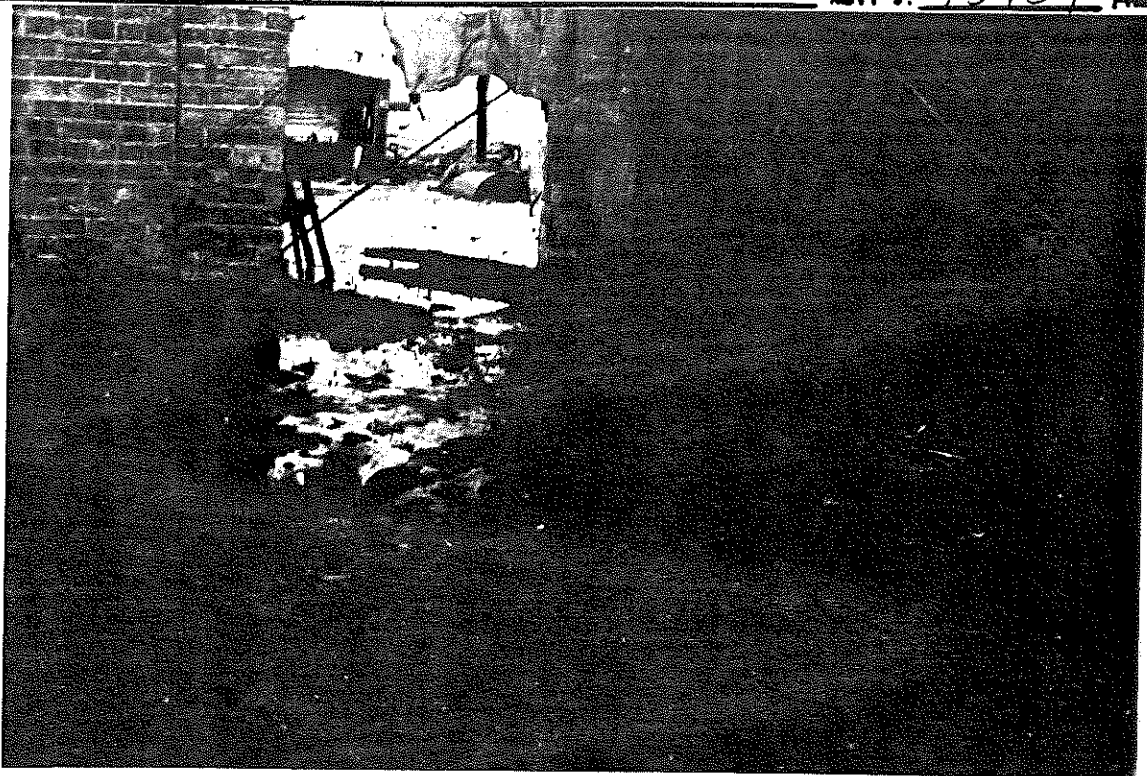
Photograph by: Gino Bruni



↑  
S

Comments: Inside Building F. Contamination of ground.

Roll #: 93-154 Photo #:     



↑  
SW

Comments: Foreground, Building F, Background Building G. Approximately

02-154



Illinois Environmental Protection Agency Photographs

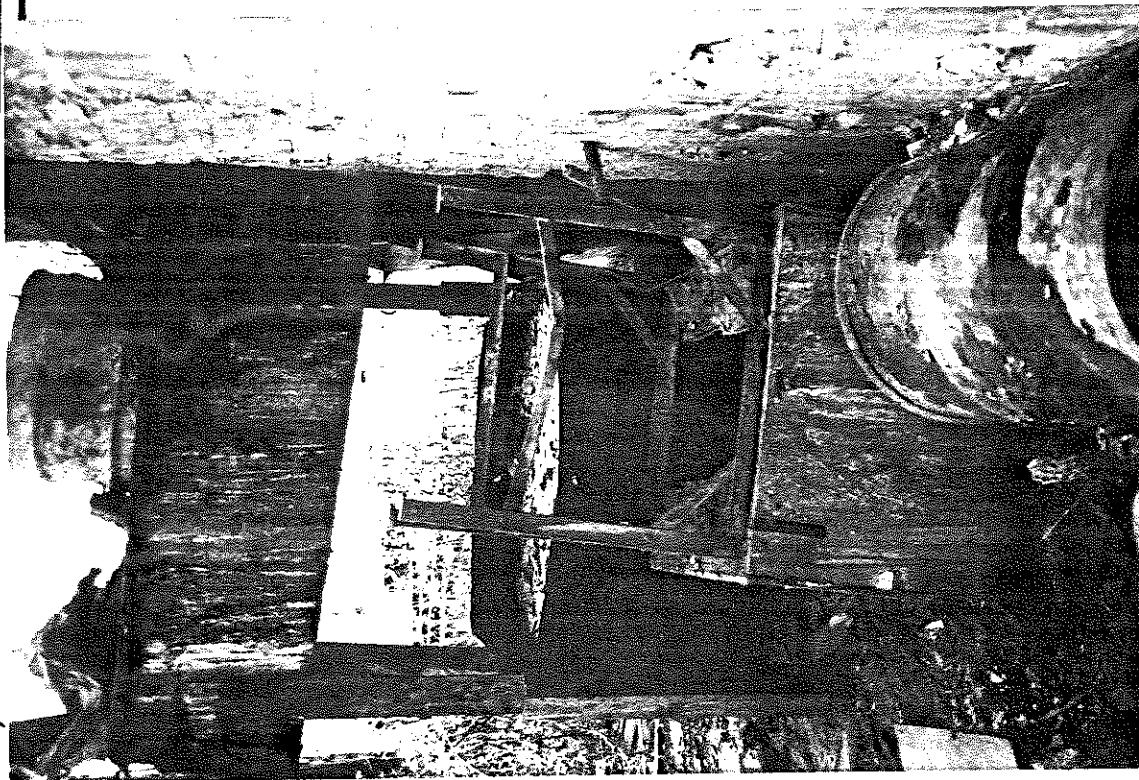
Site Name: 1W1 Industries

IRPA #: 0311740003

Date: 11-24-92

Time: 9:30-1200

Photograph By: Gino Brunig



Comments: Unknown material in container on west side of Building G/F



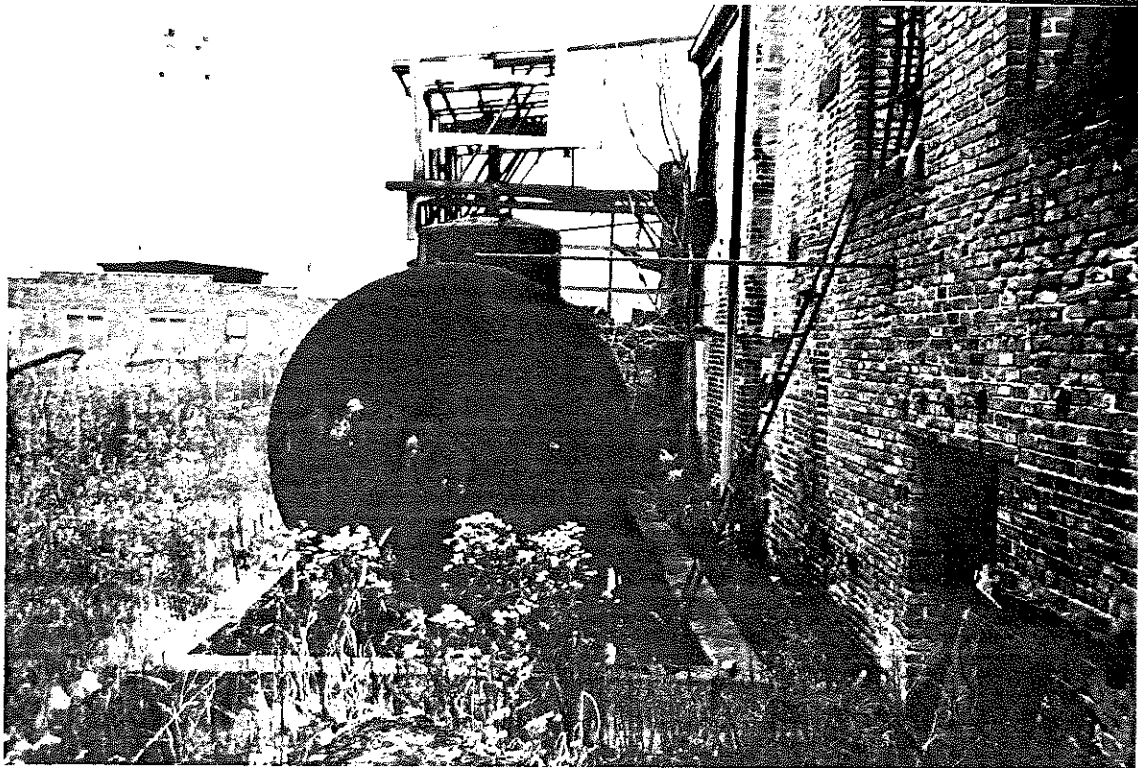
Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

Site #: 0311740003

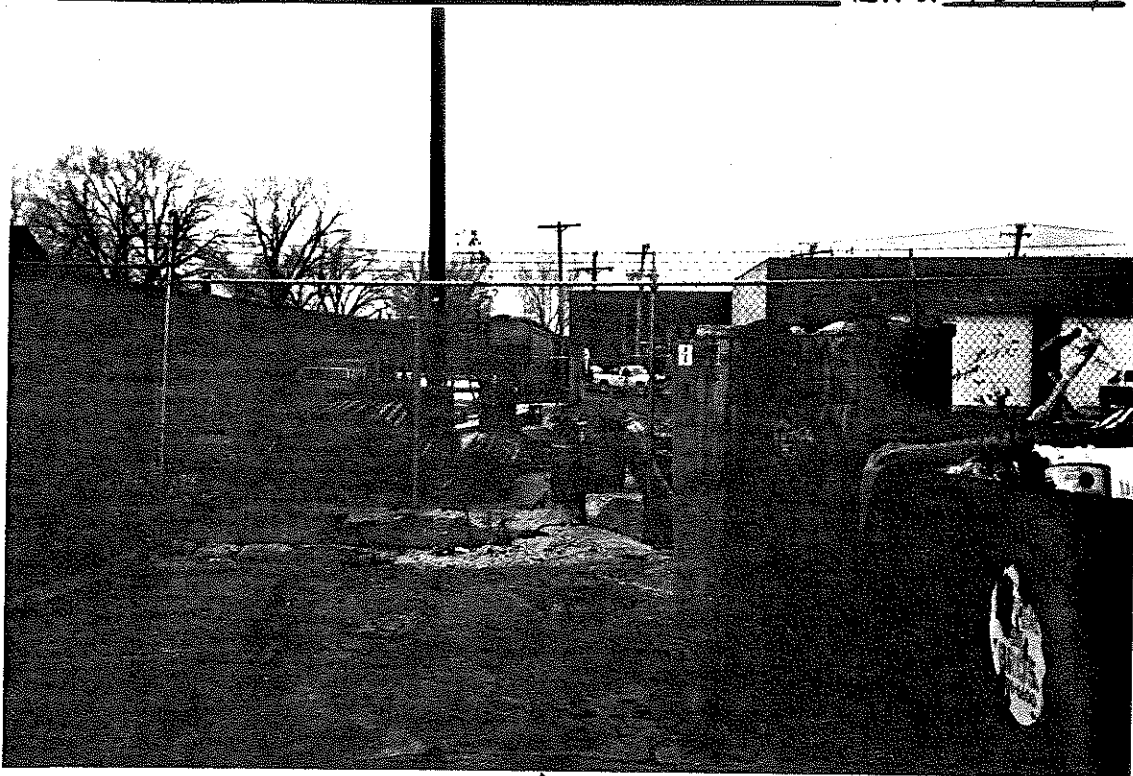
Date: 11-24-92 Time: 9:30 - 12:00

Photograph by: Gino Bruni *GB*



Comments: Tank - contents unknown. <sup>27</sup>

Roll #: 93-154 Photo #: 01



Comments: Tote containing "grease" + dumpster containing refuse. <sup>27</sup>  
93-154



Illinois Environmental Protection Agency Photographs

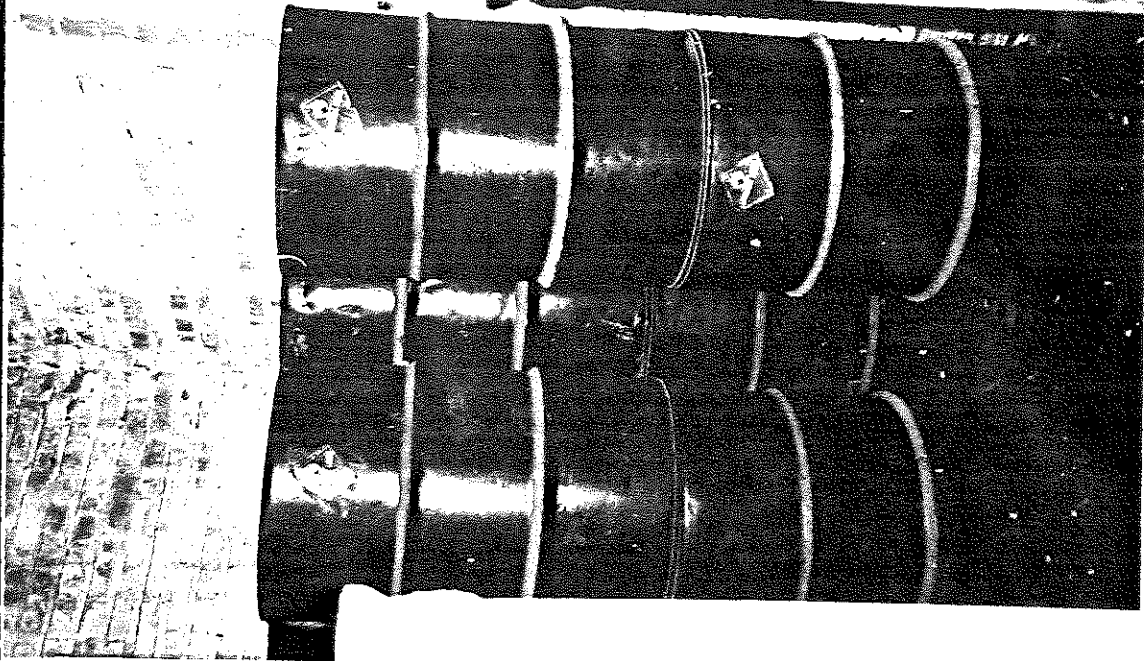
Site Name: 1W1 Industries

INPA #: 0311740023

Date: 11-24-92

Time: 9:30 1200

Photograph By: Gino Bruni



Comments: Empty drums labeled Flammable - NW corner of Building S

2W



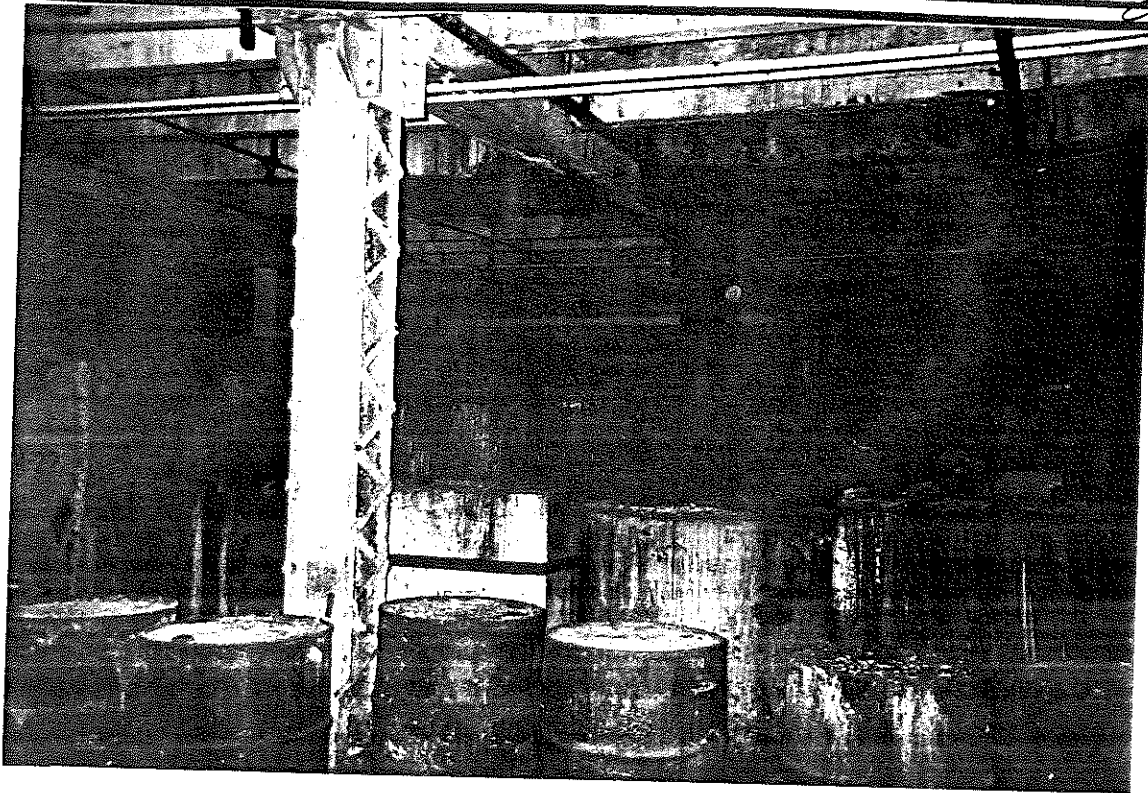


Site Name: LWI Industries

Site #: 0311740003

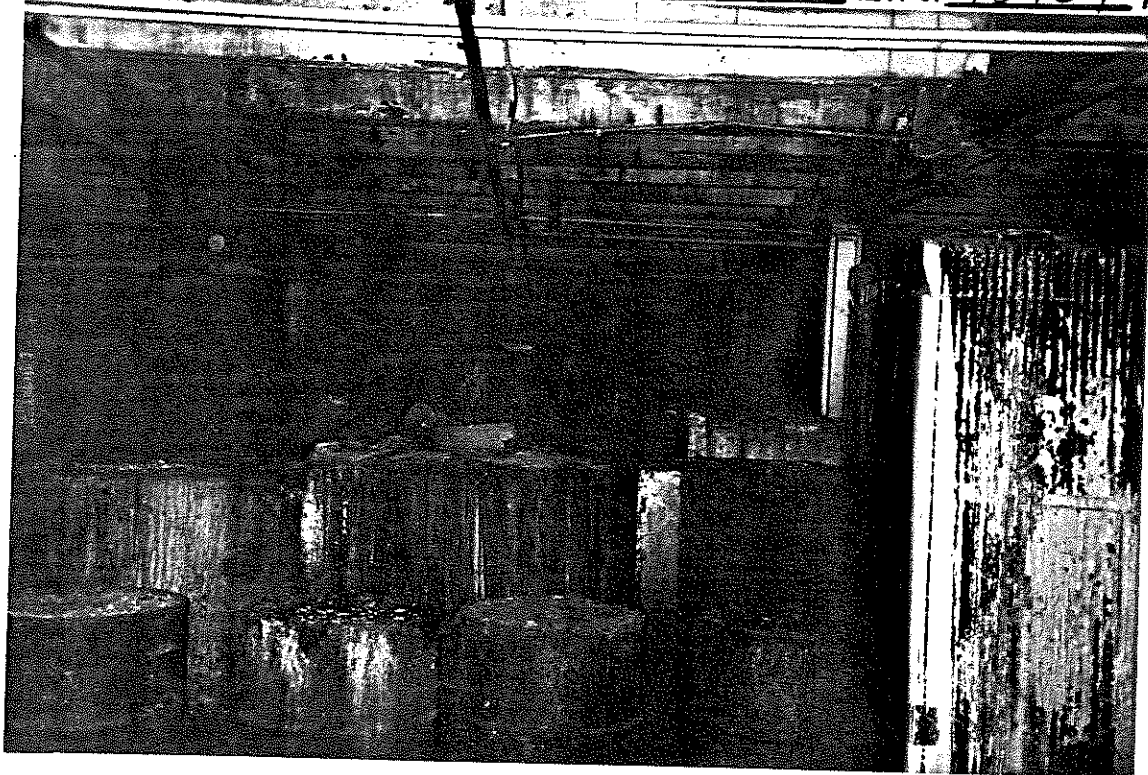
Date: 11-24-92 Time: 930 - 1200

Photograph by: Gino Bruni *JB*



Comments: Drums + Totes filled w/ unknown material. Building A

Roll #: 93-154 Page #: 21



Comments: Close up of photo #21



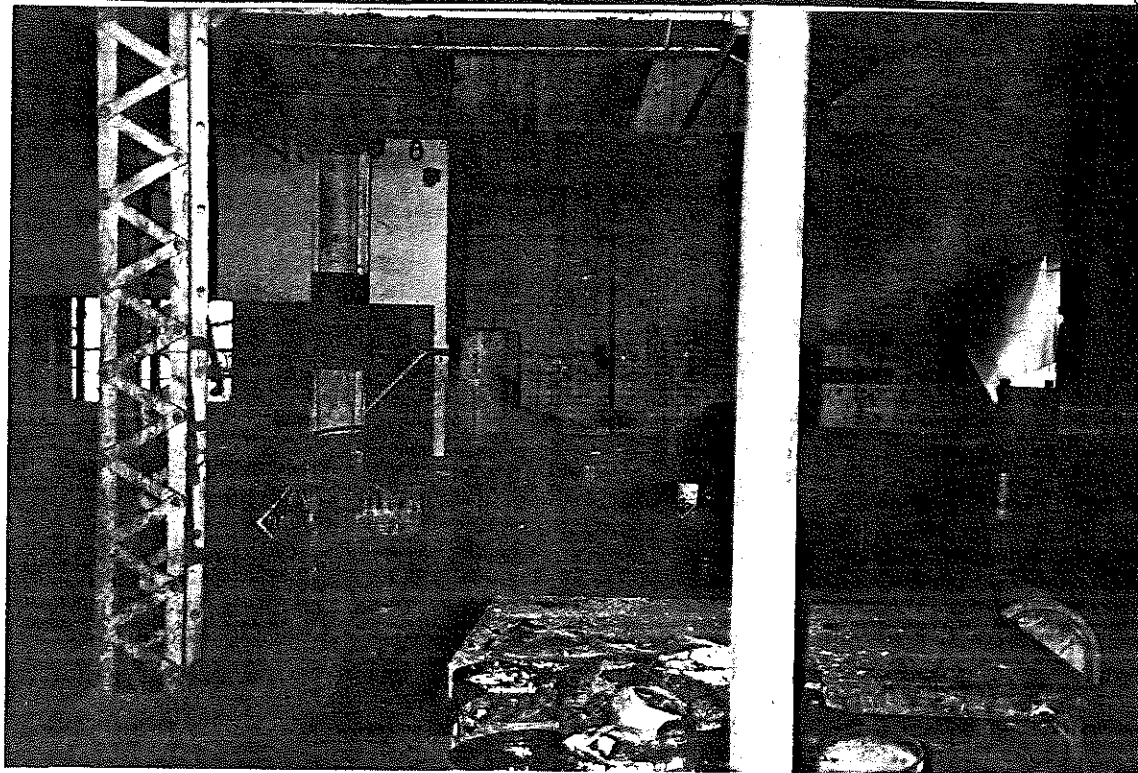
Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

Site #: 0311740003

Date: 11-24-92 Time: 9:30 - 12:00

Photographer: Gino Bruni *JB*



Comments: Pails & Drums of unknown material. Building A

Roll #: 93-154 Photo #: 23

Comments:

02-1111



Illinois Environmental Protection Agency Photographs

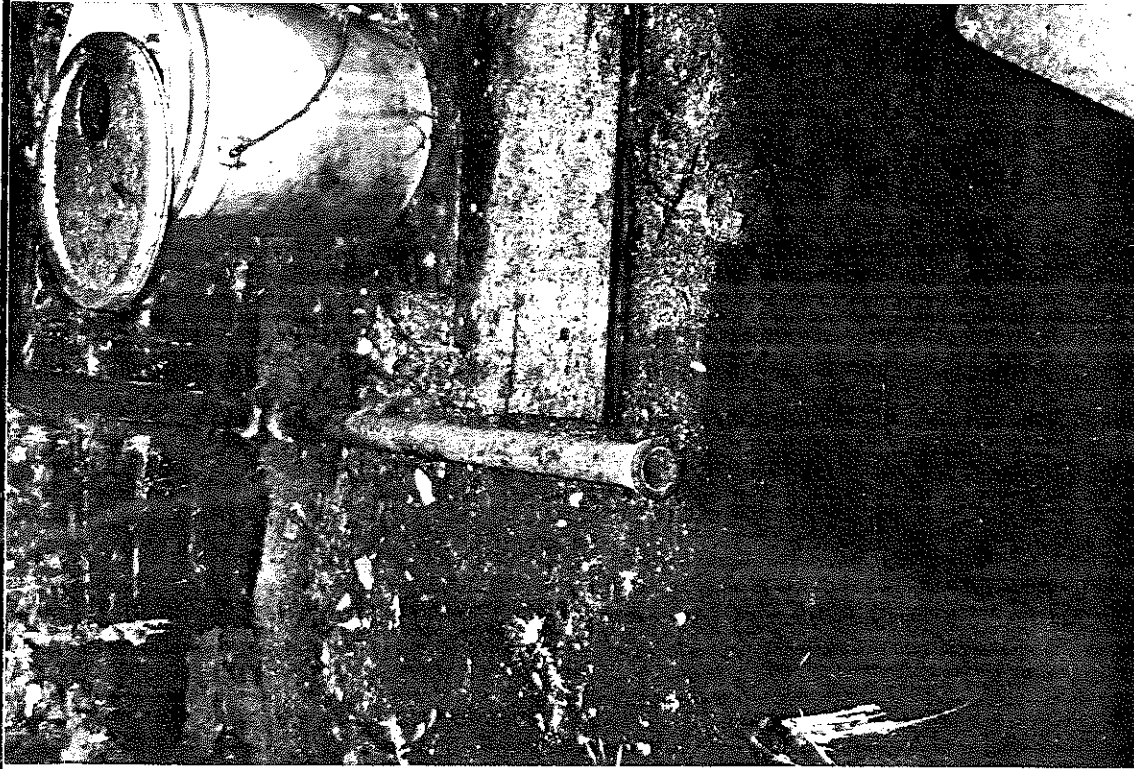
Site Name: 1W1 Industries

IRPA #: 031174003

Date: 11-24-92

Time: 930 1200

Photograph By: Gina Bruni



Comments: North wall of Building A. Pipe leading into floor sump.



Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

Date: 11-24-92 Time: 930 - 1200

Site #: 0311740003

Photograph by: Gino Bruni JB



↑  
NE

Comments: Sanitary sewer containing red material also found in  
drains along east buildings.

Roll #: 93-155 Photo #: 25



↑  
NE

Notes: Close up of Photo 1





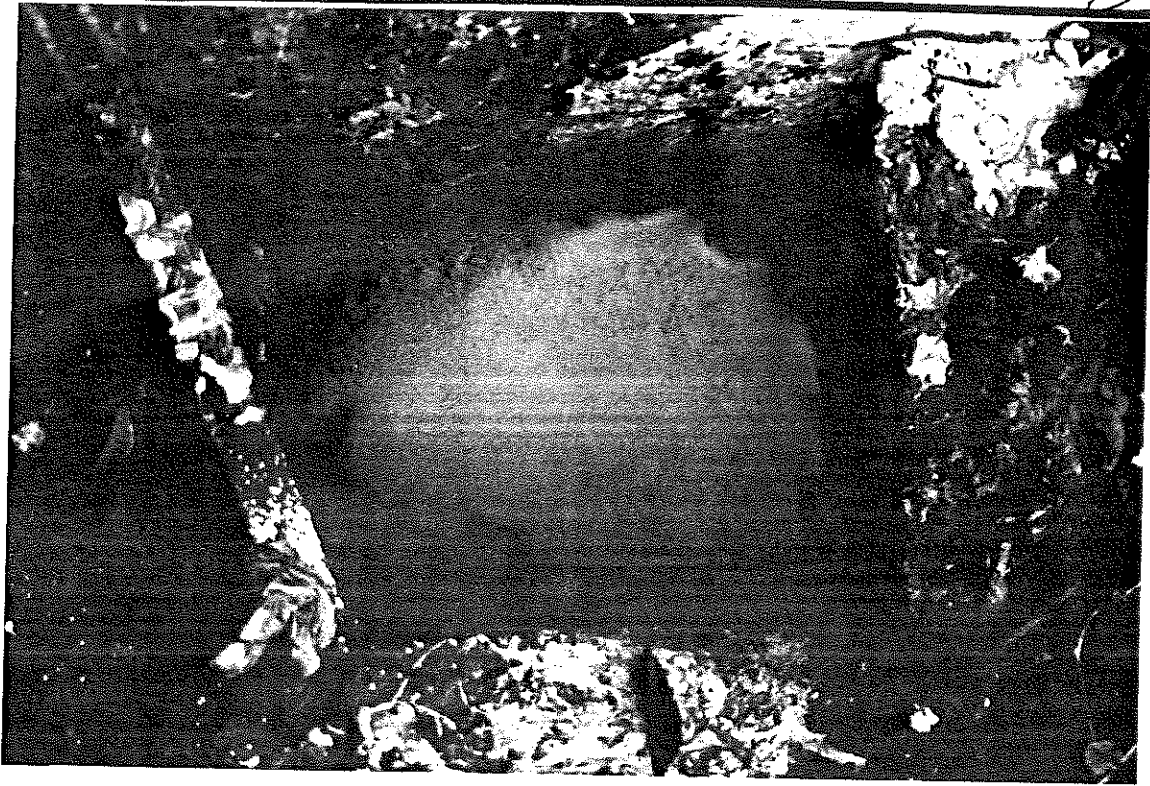
Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

Site #: 0311740003

Date: 11-24-92 Time: 9:30 - 12:00

Photograph by: Gino Bruni JMB



Comments: Close up of drain. Far <sup>↑</sup> Southeast drain

Roll #: 93-155 Photo #: 37



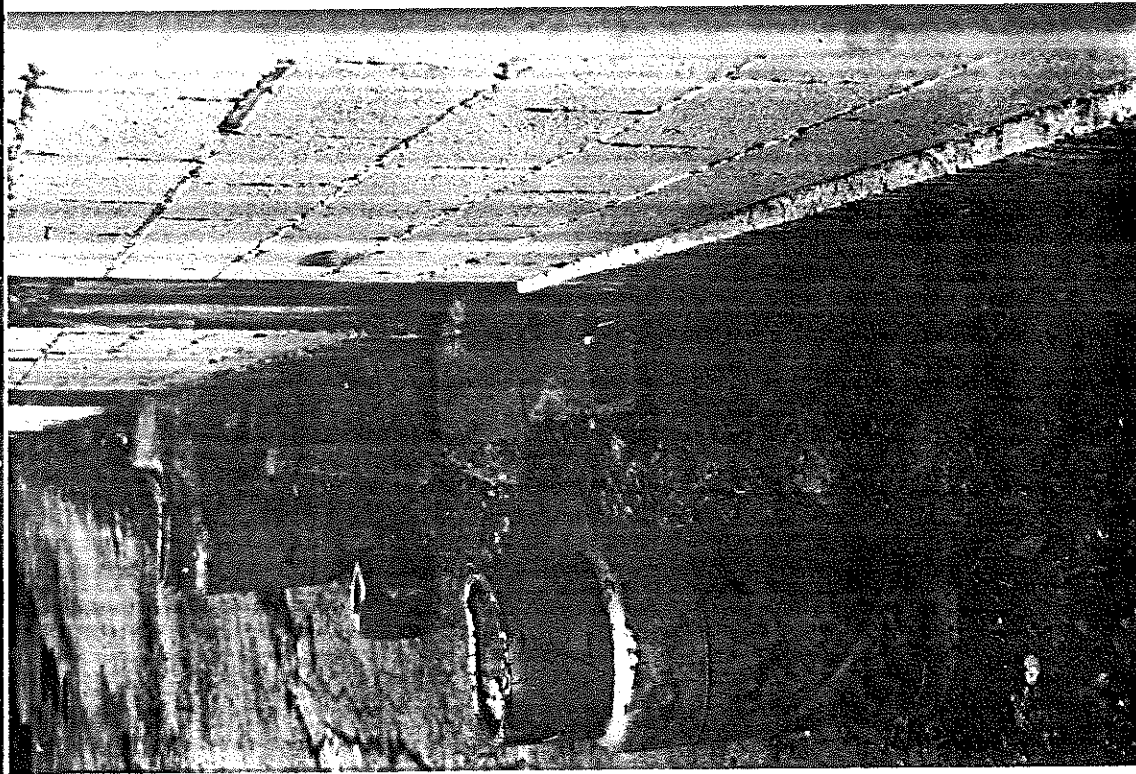
Illinois Environmental Protection Agency Photographs

Site Name: 1 W1 Industries

IEPA #: 0311740003

Date: 11-24-92 Time: 9:30 AM

Photograph By: Gino Bruni



Comments: East drain containing red material

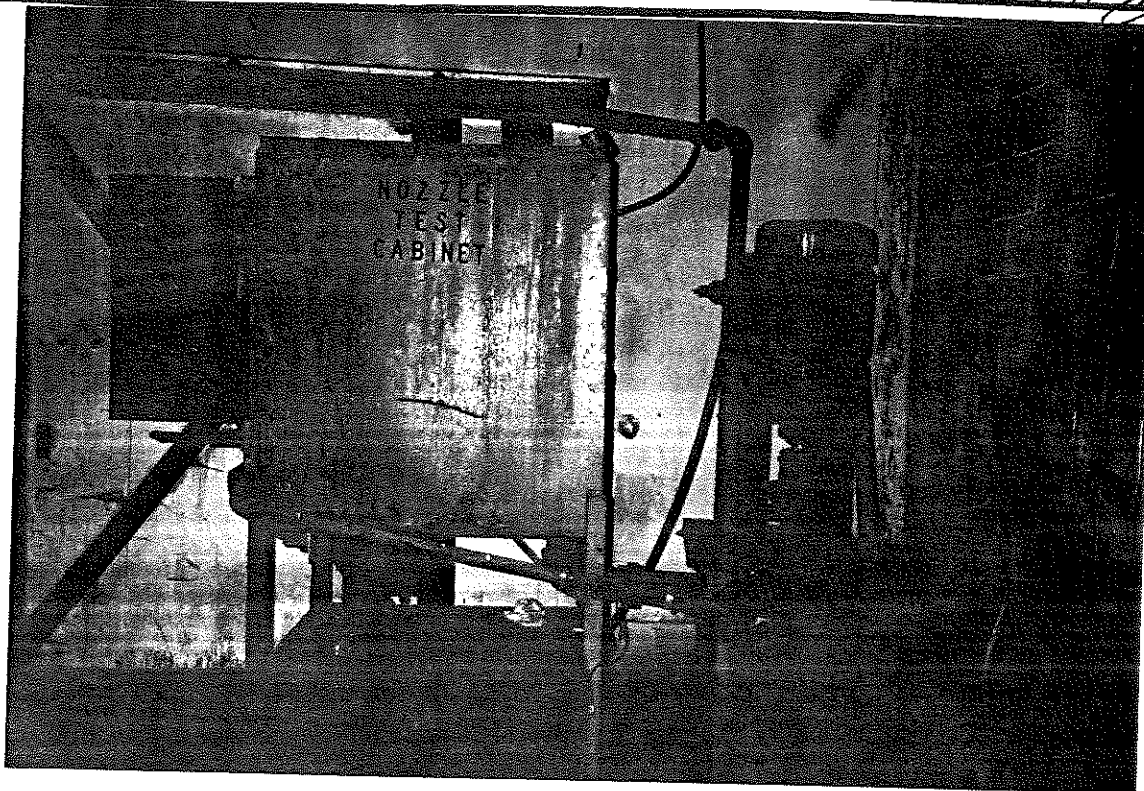


SITE NAME: LWL Industries

SITE #: 0311740003

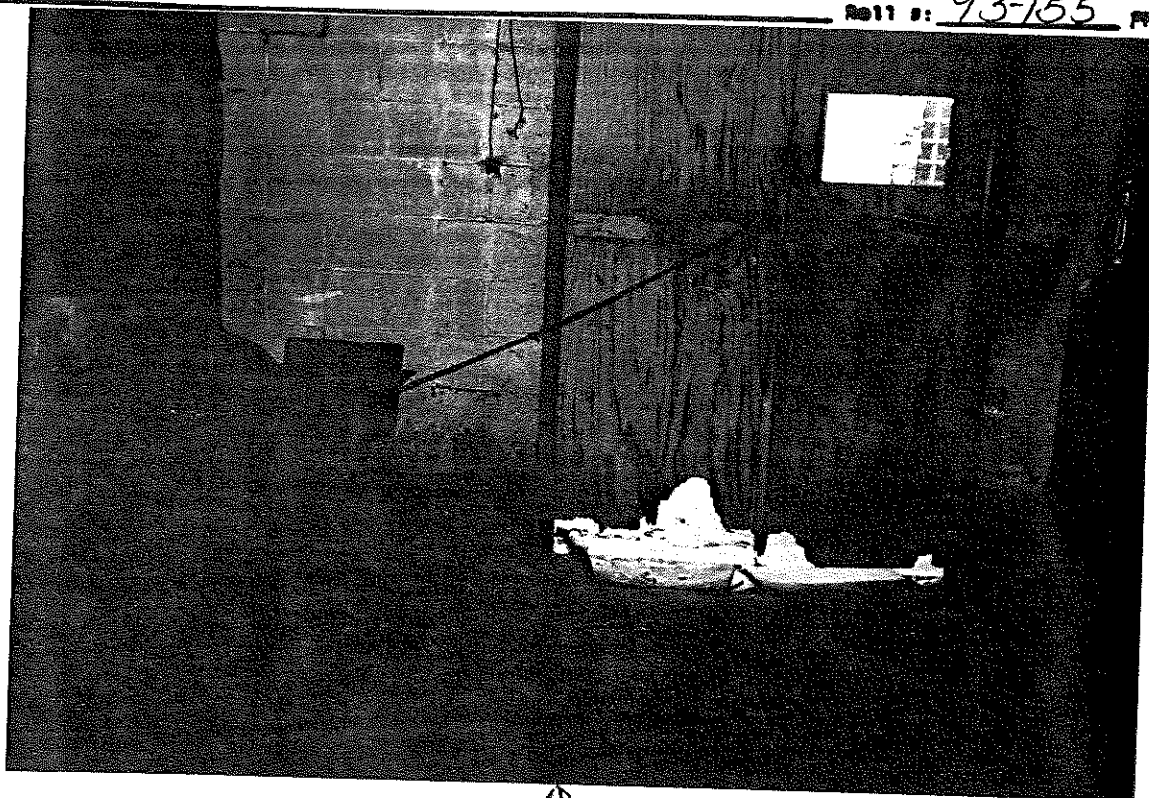
DATE: 11-24-92 TIME: 930 - 1200

PHOTOGRAPH BY: Gino Bruni MB



CAMERA: Nozzle test cabinet Building M. <sup>↑</sup>  
S

ROLL #: 93-155 PHOTO #: 29



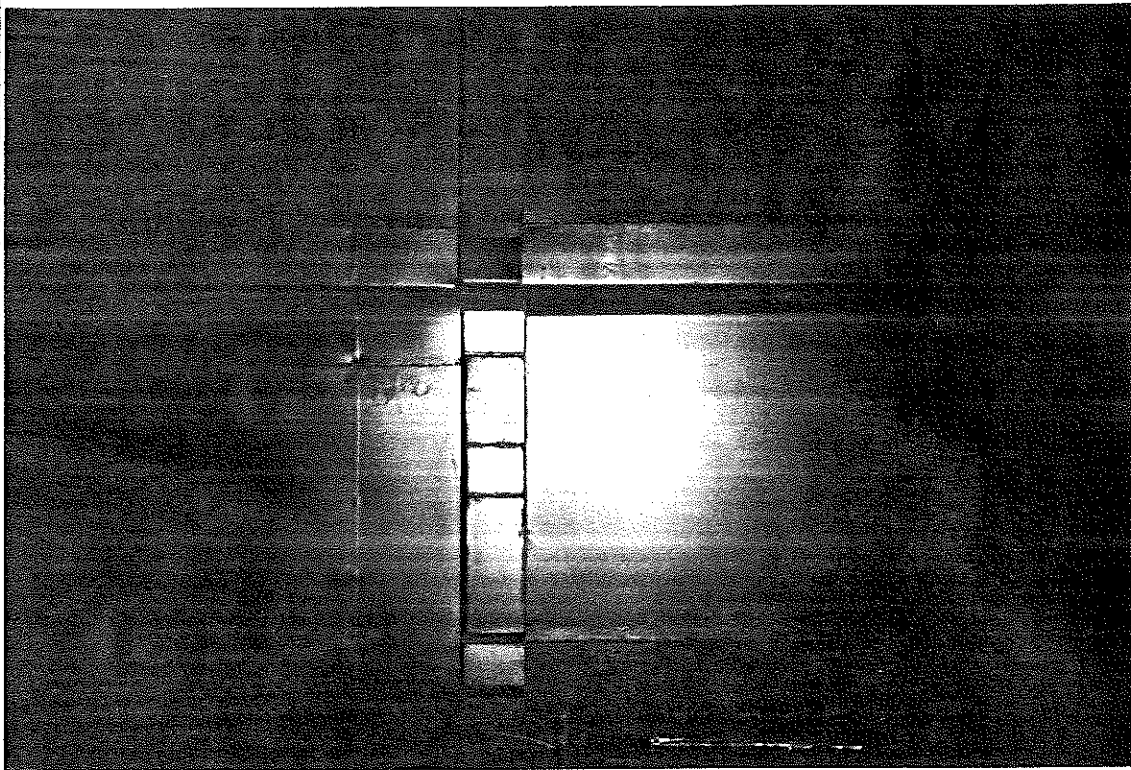
CAMERA: Pipe leading from nozzle test cabinet to outside (E) drain. <sup>↑</sup>  
R 114 113 03-114



Illinois Environmental Protection Agency Photographs

Site Name: 1W1 Industries ISPA #: 0311740003

Date: 11-24-92 Time: 9:30 AM Photograph By: Gina Bruni



Comments: Totes painted w/ same color as second in east drains.





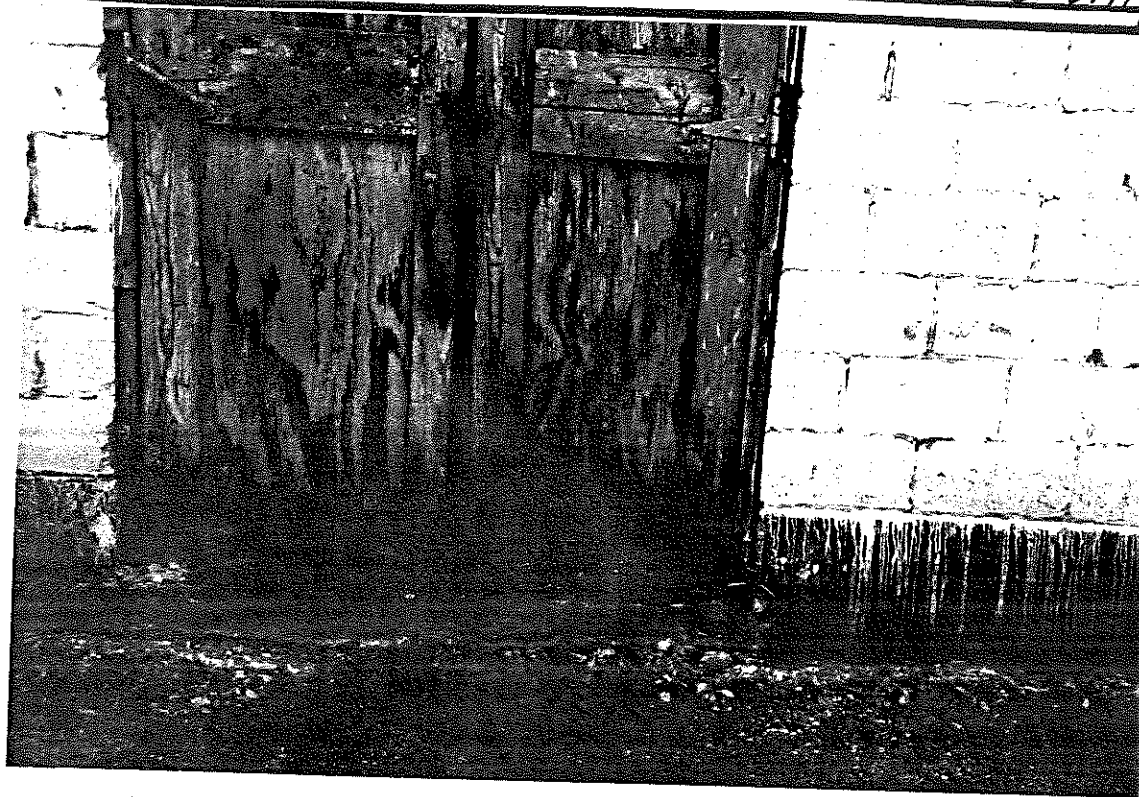
Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

Site #: 0311740003

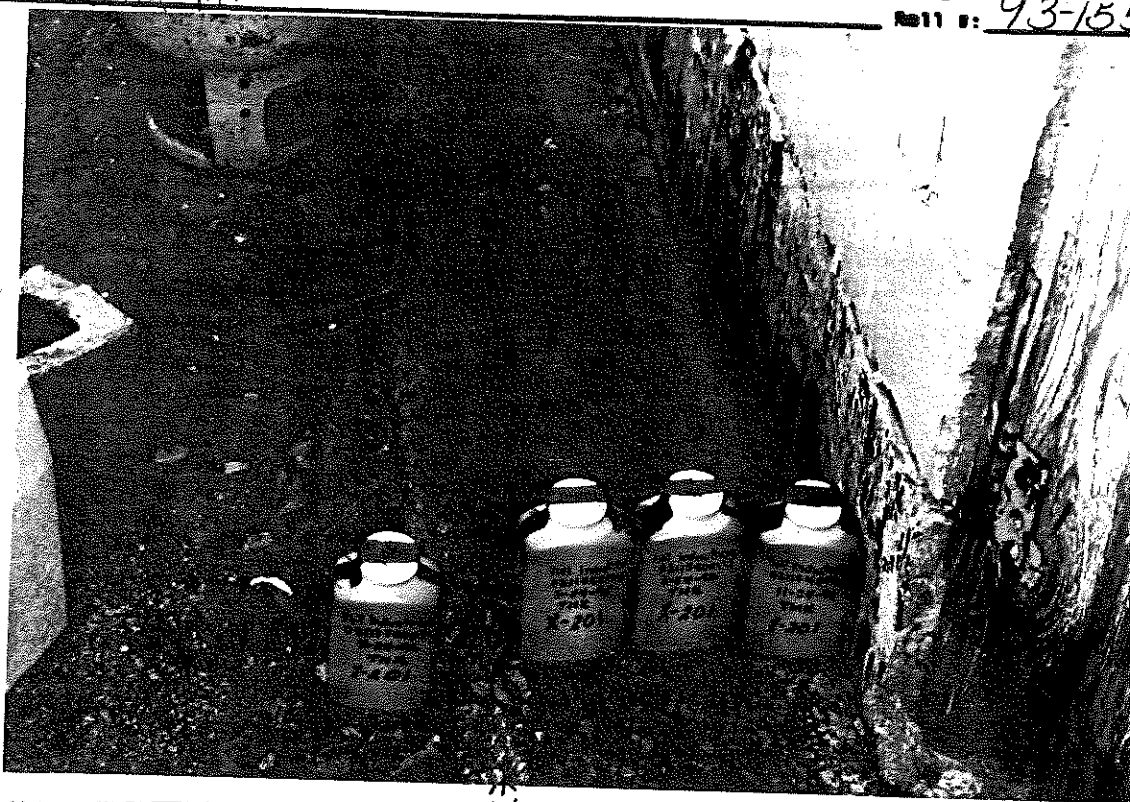
Date: 11-24-92 Time: 930 - 1200

Photograph by: Gino Bruni JB



Comments: Pipe from nozzle test cabinet leading to east drain  
Building M.

Roll #: 93-155 Photo #: 33



Comments: Samples taken from east drain -- south end.



Illinois Environmental Protection Agency Photographs

Site Name: LWI Industries

Site #: 0311740003

Date: 11-24-92 Time: 9:30 - 12:00

Photograph by: Gino Bruni *GB*



Comments: Close-up of photo 33.

Roll #: 93-155 Photo #: 34

Comments: Close

02-11-95



Illinois Environmental Protection Agency Photographs

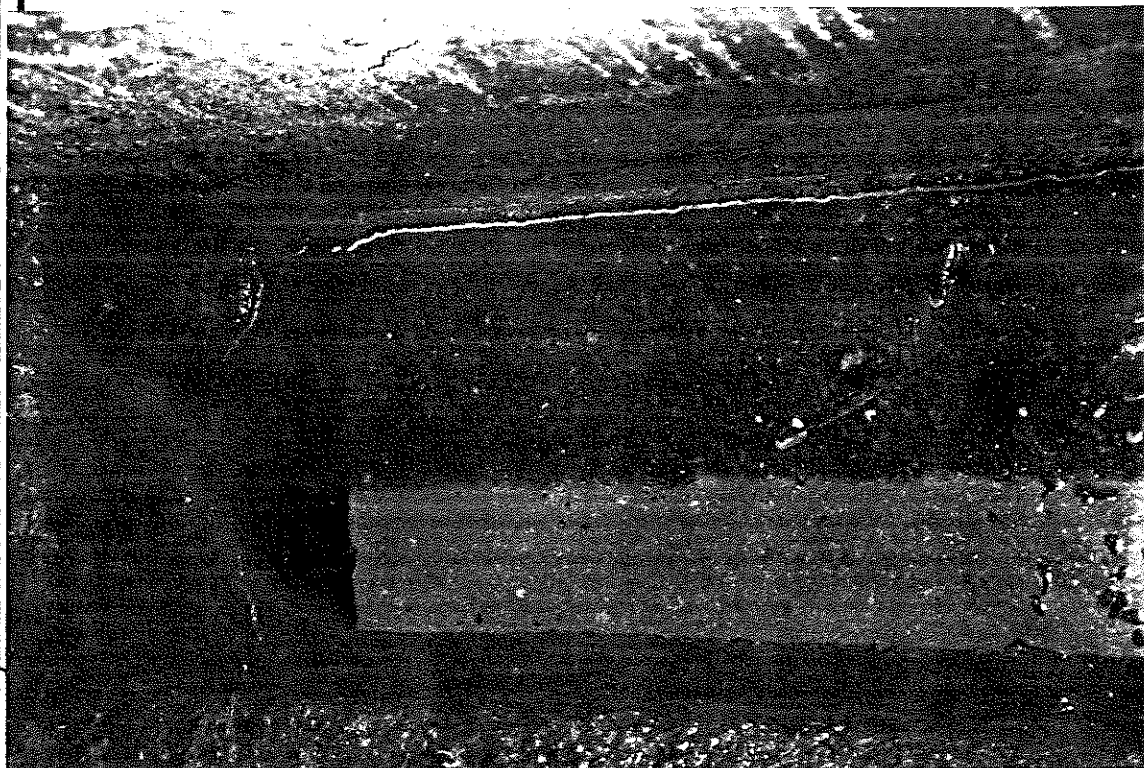
Site Name: 1W1 Industries

IRPA #: 0311740003

Date: 11-24-92

Time: 930 1200

Photograph By: Gina Bruni



Comments: Close up of east drain



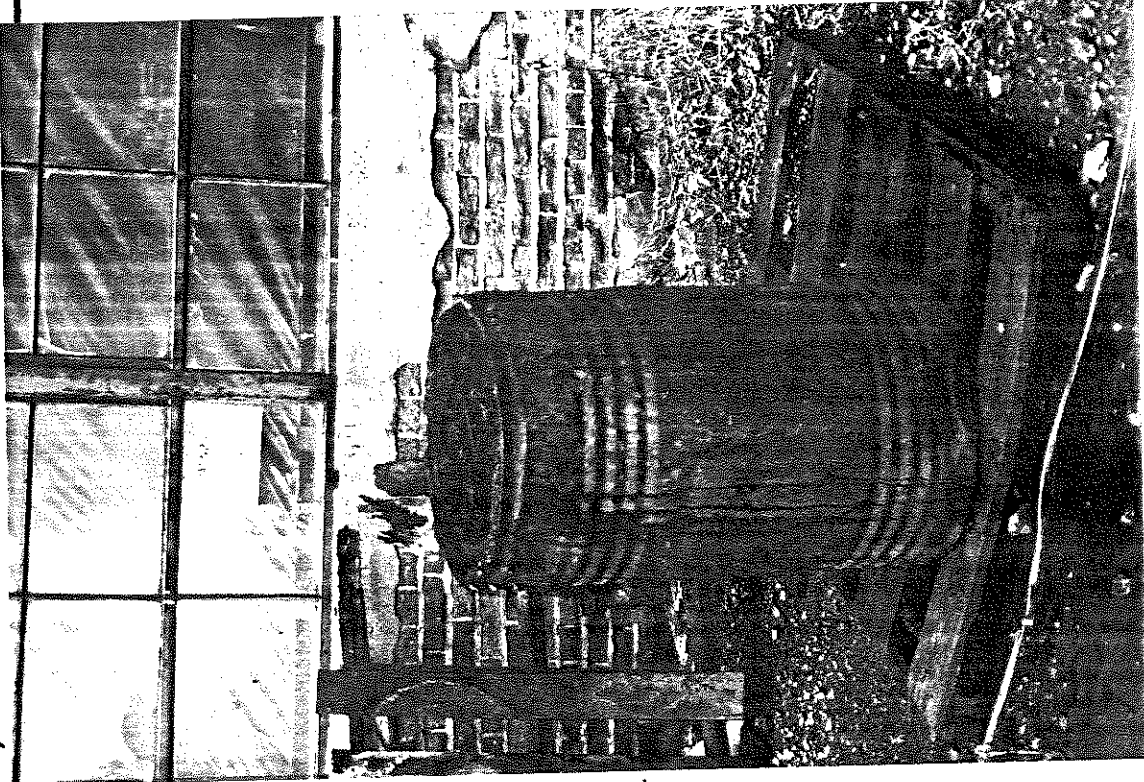
Illinois Environmental Protection Agency Photographs

Site Name: 1W1 Industries

ISPA #: 0311740903

Date: 11-24-92 Time: 9:30 AM

Photograph By: Gina Bruni



21

Comments: Drum of what appears to be paint waste





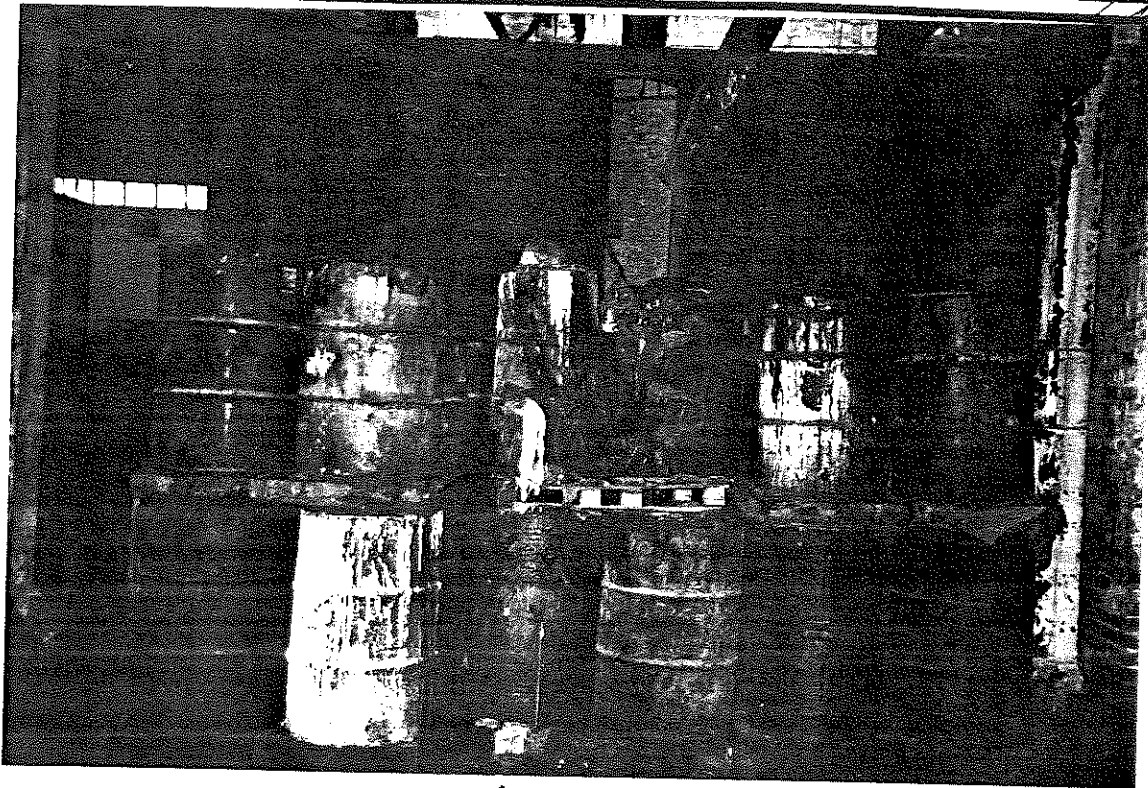
Illinois Environmental Protection Agency Photographs

Site Name: LWL Industries

Site #: 0.311740003

Date: 11-24-92 Time: 930 - 12<sup>00</sup>

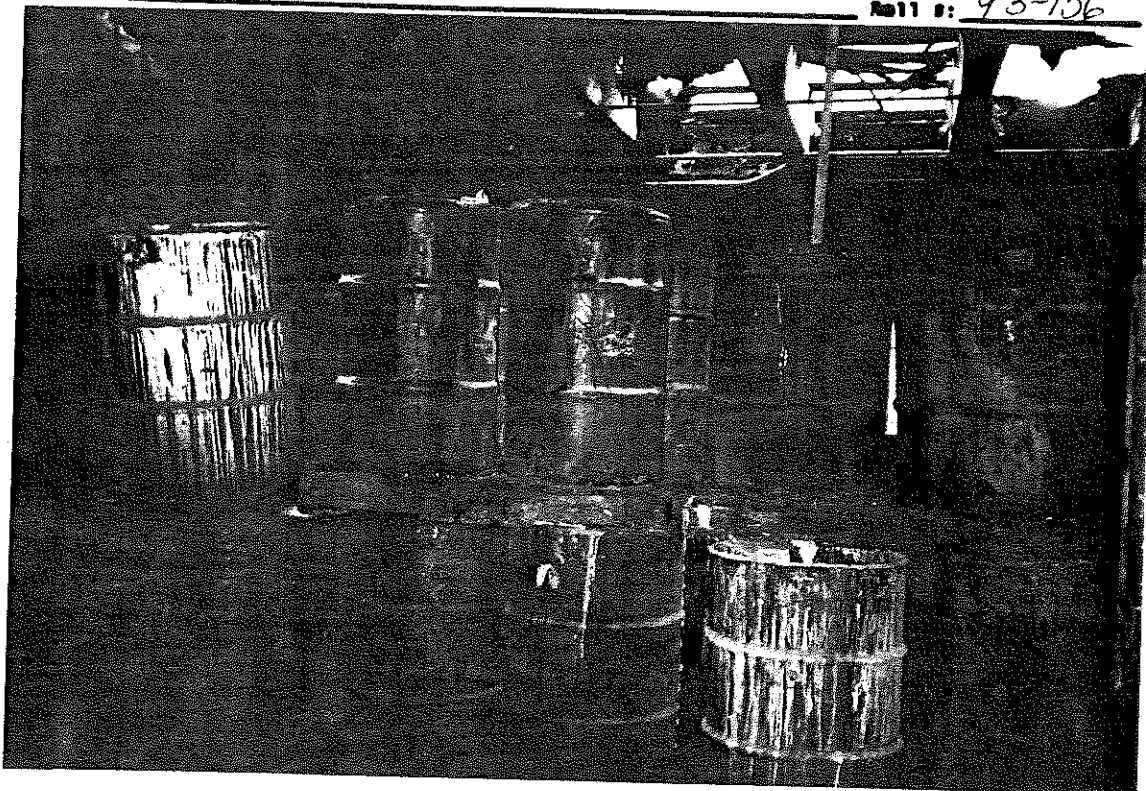
Photographer: Gino Bruni



↑  
E  
Comments: Drums of unknown material Building A

Roll #: 93-156

Photo #: 37



↑  
Comments: Drums of unknown material Building A



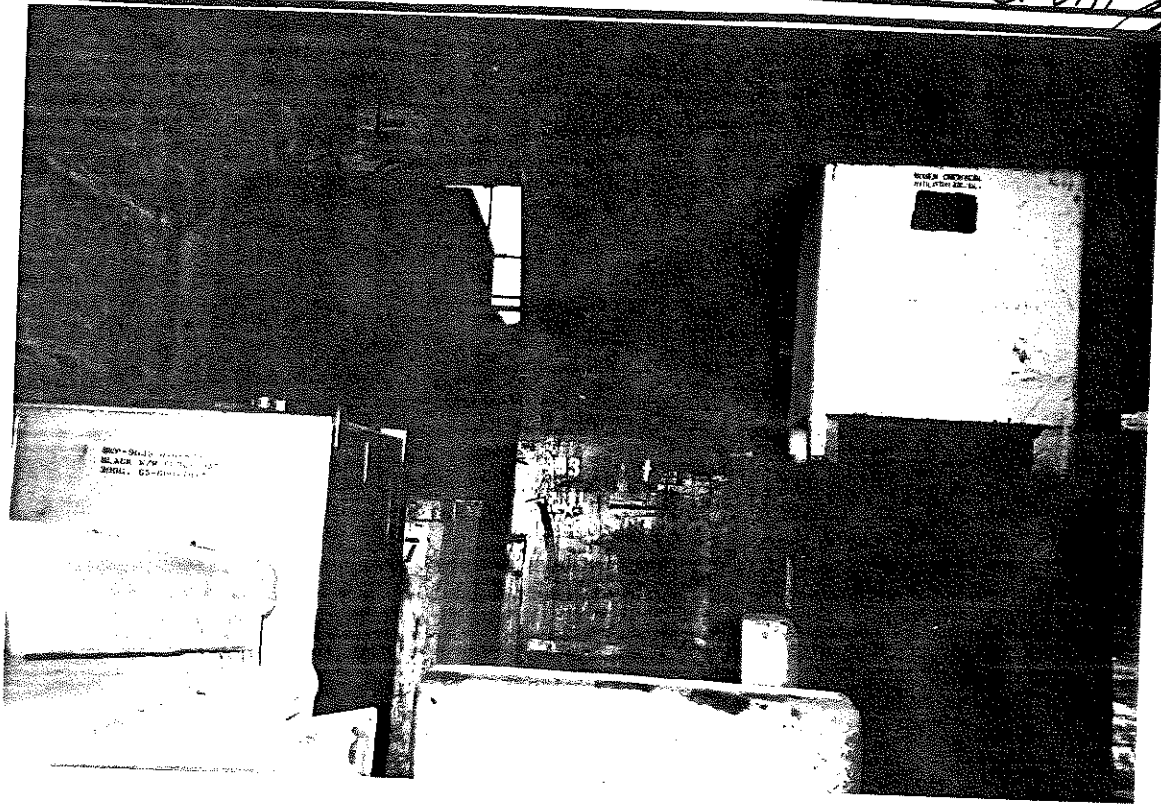
Illinois Environmental Protection Agency Photographs

SITE NAME: LWI Industries

SITE #: 0311740003

DATE: 11-24-92 TIME: 930 - 12<sup>00</sup>

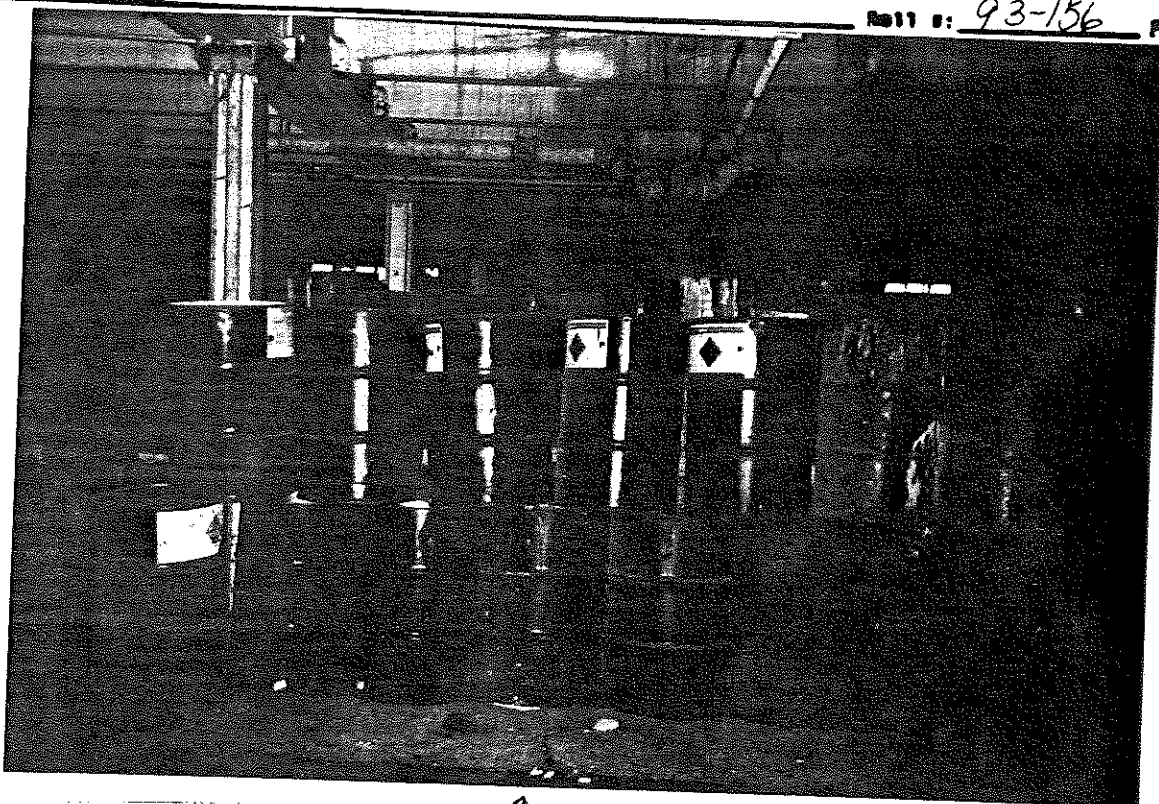
PHOTOGRAPHER BY: Gino Bruni



COMMENTS: Takes Building A



Roll #: 93-156 Photo #: 39



COMMENTS: Drums of unknown material. Building A.



Illinois Environmental Protection Agency Procedures

SITE NAME: LWI Industries

SITE #: 0311740003

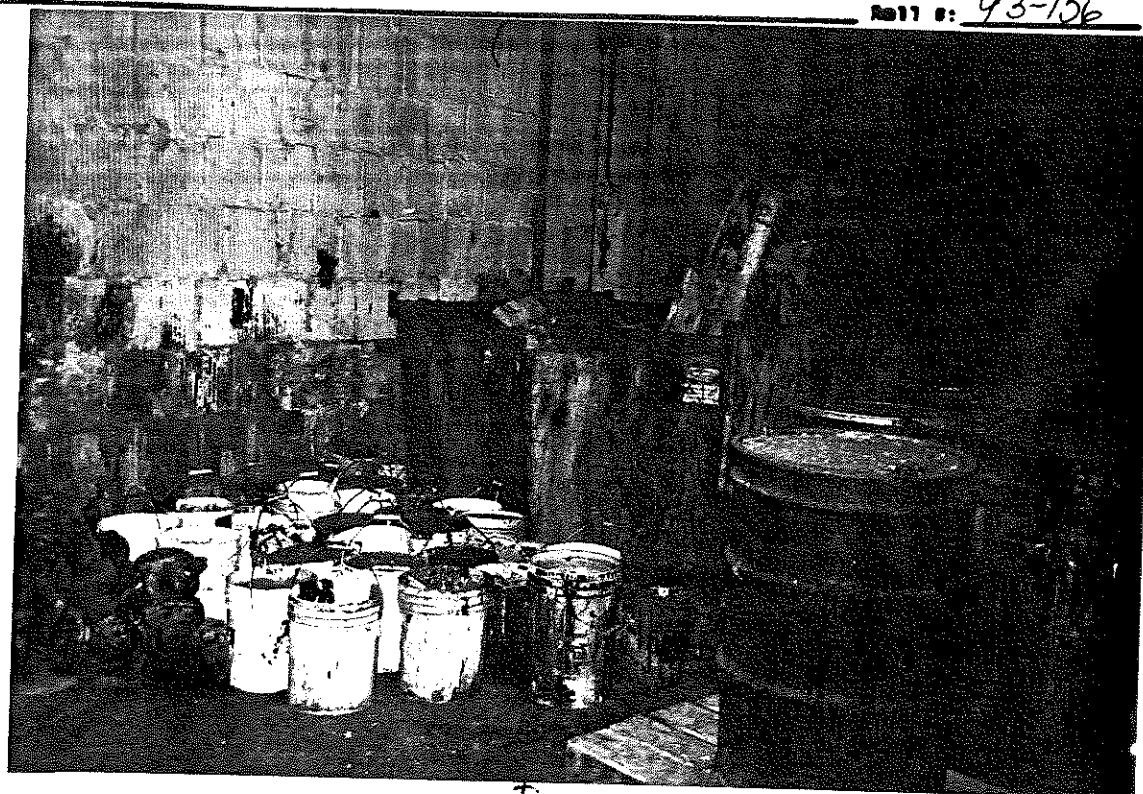
DATE: 11-24-92 TIME: 930 - 1200

PERFORMED BY: Gino Bruni



↑  
 COMMENTS: Close up of label on drums in photo 40. Building A

Roll #: 93-156 Photo #: 41



↑ NW  
 COMMENTS: Pails + drums of unknown material -- appeared to be



Site Name: LWI Industries

Site #: 0311740003

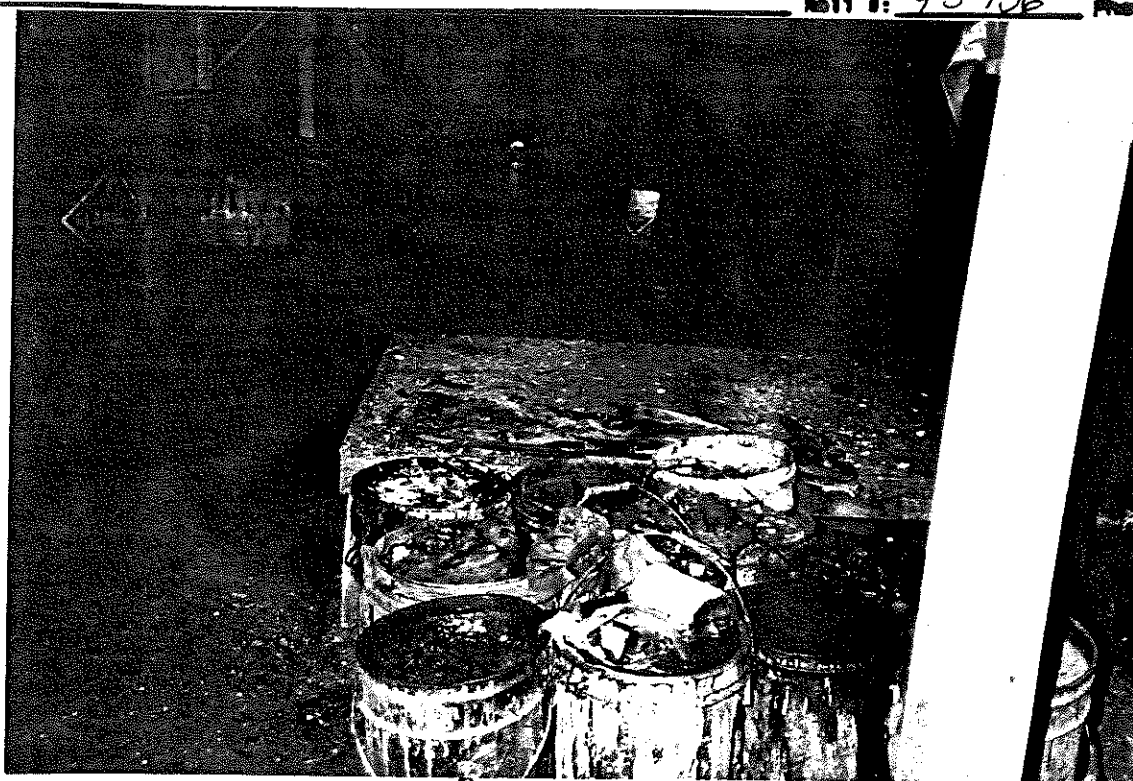
Date: 11-24-92 Time: 9:30 - 12:00

Photograph by: Gino Bruni



Comments: Drums of unknown material - Building A.

Roll #: 93-156 Photo #: 43



Comments: Drums + Pails of unknown material Building A.



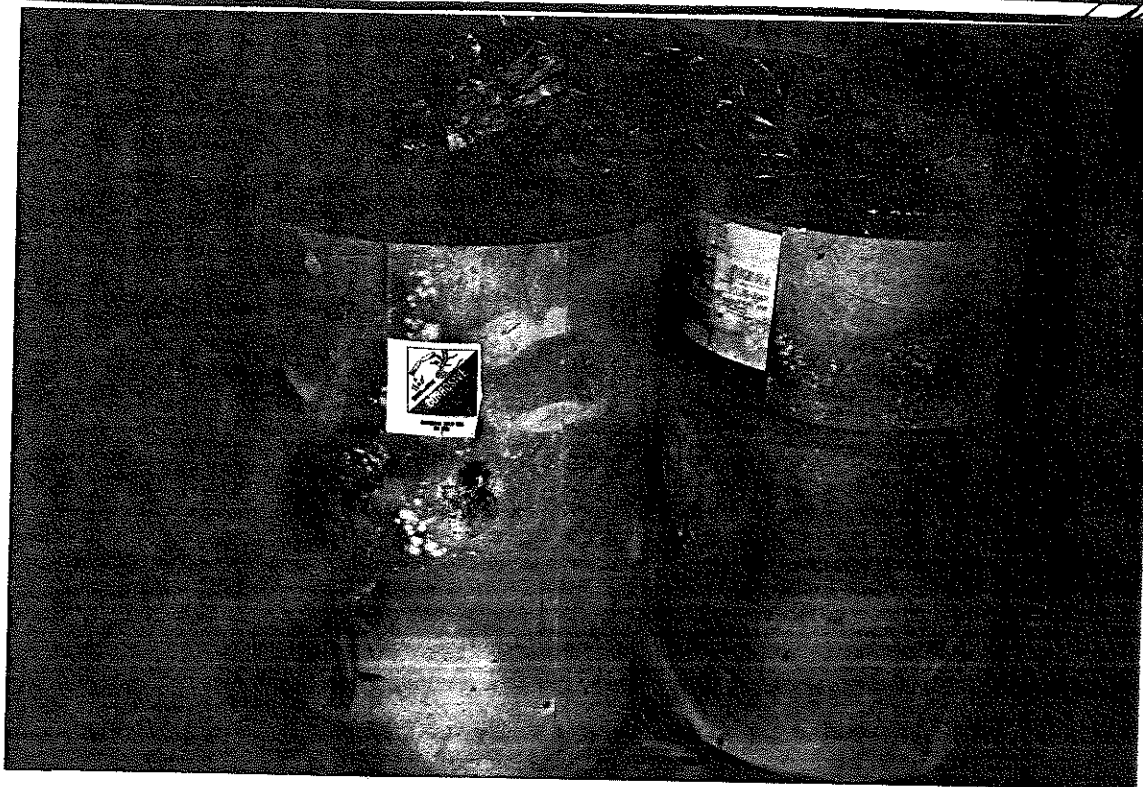


Site Name: LWI Industries

Site #: 0311740003

Date: 11-24-92 Time: 9:30 - 12:00

Photograph by: Gino Bruni



Comments: 2 drums of unknown material <sup>↑</sup> labeled corrosive - Buttingl

Roll #: 93-156 Photo #: 45



Comments: Material found in former processing tank <sup>↑</sup> Building S.

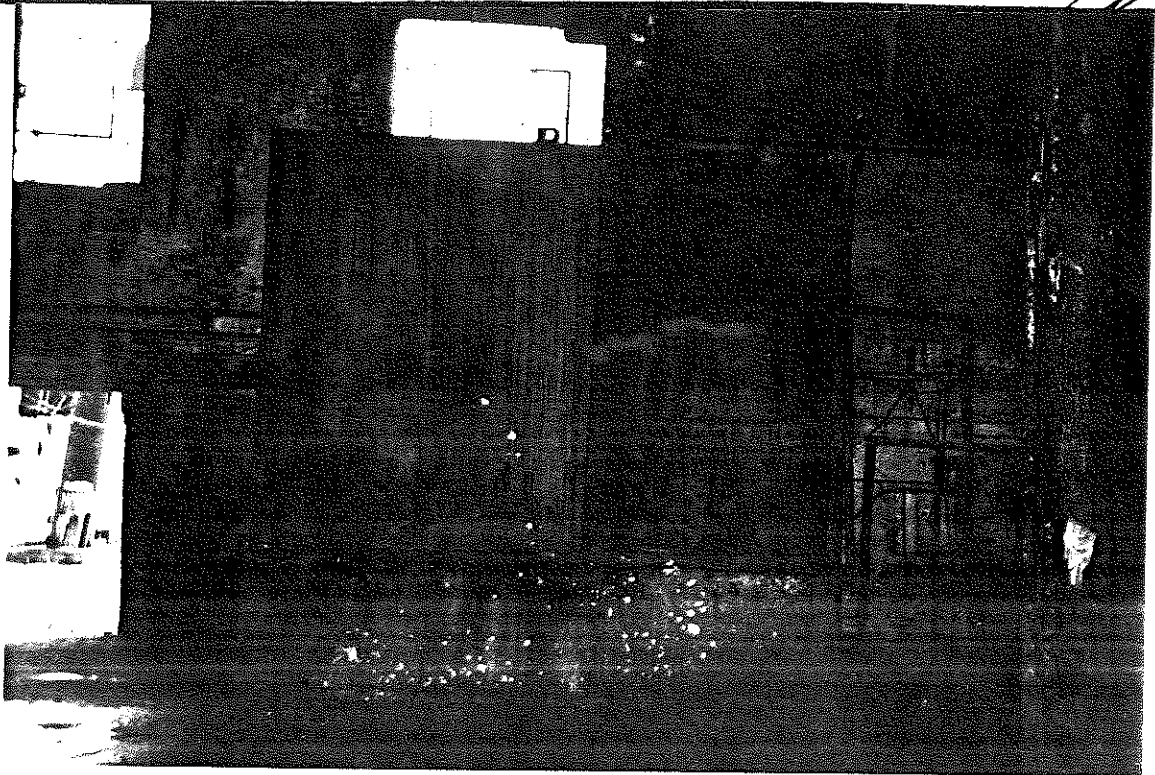


Site name: IWI Industries

Site #: 0311740003

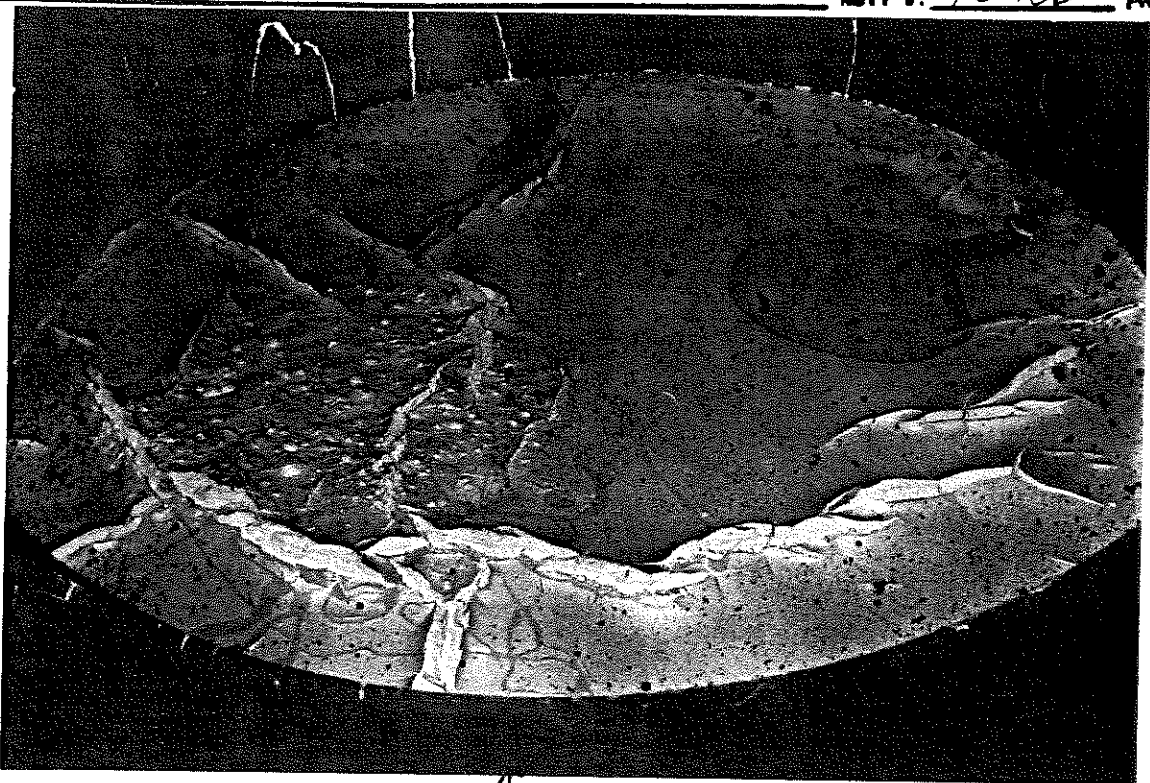
Date: 11-24-92 Time: 930 - 12<sup>00</sup>

Photograph by: Gino Bruni



Comments: Former processing area. ↑ (Tote emptying + cleaning)

Roll #: 93-156 Photo #: 47



Comments: Building N. Paint waste.

93-156


47



1WI Industries  
0311741 003  
11-24-12

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr		Sub Sec	Yes		
OTH	1			<b>PART 703</b> <b>RCRA PERMIT PROGRAM</b> <b>Subpart C: Authorization by Rule and Interim Status</b>  <b>Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications</b>				
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1				<b>Section 703.151: Application by New HWM Facilities</b>  For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes _____ No _____  Is the facility only operating with a RCRA permit? Yes _____ No _____  <b>NOTE:</b> This violation should be cited in the CIL only after receiving approval from headquarters.			✓	
OTH	1				<b>Section 703.152: Amended Part A Application</b>  Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:  1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes _____ No _____ N/A _____  2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes _____ No _____ N/A _____  <b>NOTE:</b> The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.			✓	no Part A 

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<b>Section 703.154: Prohibitions During Interim Status</b>				
			a	During interim status, has the facility refrained from: - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ____ No <input checked="" type="checkbox"/>				
			b	- Employing processes not specified in Part A of the permit application? Yes ____ No ____				
			c	- Exceeding the design capacities specified in Part A of the permit application? Yes ____ No ____				
OTH	1			<b>Section 703.155: Changes During Interim Status</b>				
			d	<b>NOTE:</b> Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.  Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ____ No ____ N/A ____				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF</b> <b>HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart A: General Provisions</b>  <b>Section 725.101: Purpose, Scope and Applicability</b>  Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes _____ No <input checked="" type="checkbox"/>  <b>NOTE: If "Yes", explain in narrative.</b>  d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes _____ No <del>_____</del> N/A <input checked="" type="checkbox"/>				

TSD-A-1




IWI Industries  
031171 003  
11-24-12

REVISION 1 (8/15/88)

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart A: General</b>  <b>Section 722.111: Hazardous Waste Determination</b>  Has the generator determined if the solid waste it generates is a hazardous waste? Yes ____ No <u>✓</u>  Did the generator follow the procedures specified in this section in making its determination? Yes ____ No <u>✓</u>		✓		generate paint waste
OTH	1				<b>Section 722.112: USEPA Identification Number</b>  a Has the generator obtained a USEPA identification number? Yes ____ No <u>✓</u>  c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ____ No ____ N/A <u>✓</u>		✓		No 8700-12 form was ever submitted. IWI was assigned an ID# by the USEPA. The USEPA considers IWI a disposal facility + needed a number for filing purposes.

GEN-A-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart B: The Manifest</b>  <b>Section 722.120: General Requirements</b>				No waste shipped off site  
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes ____ No ____ <i>N/A ✓</i>				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes ____ No ____				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes ____ No ____				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			<b>Section 722.121: Acquisition of Manifests</b>  a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes ____ No ____ N/A ____  b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest?  or  For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes ____ No ____ N/A ____				
MAN	2			<b>Section 722.122: Number of Copies</b>  Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?				
MAN	2			<b>Section 722.123: Use of the Manifest</b>  For each manifest received, has the generator:  1) Signed the certificate by hand? Yes ____ No ____  2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes ____ No ____				

GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
					<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes ____ No ____</p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes ____ No ____</p> <p><b>NOTE:</b> Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes ____ No ____</p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes ____ No ____ N/A ____</p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes ____ No ____ N/A ____</p>				

GEN-B-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			<b>PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements</b>				No waste ready for transport off-site
					<b>Section 722.130: Packaging</b>			✓	
					Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?				
OTH	1	X			<b>Section 722.131: Labeling</b>			✓	
					Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?				
OTH	1	X			<b>Section 722.132: Marking</b>			✓	
					a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____				
					b Is each package of hazardous waste which is ready for transportation off-site marked with:  - The generator's name and address? Yes ____ No ____  - The manifest document number associated with the container? Yes ____ No ____  - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1				<b>Section 722.133: Placarding</b>  Does the generator have, for the waste it generates, the proper placards to:  <ul style="list-style-type: none"> <li>- Placard the transport vehicle, or</li> <li>- Offer to the first transporter, according to 49 CFR, Part 172, Subpart F?</li> </ul> <b>NOTE:</b> If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			✓	
OTH	1	X			<b>Section 722.134: Accumulation Time</b>  <b>NOTE:</b> If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.  <b>NOTE:</b> A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.  a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart 1: Use and Management of Containers listed below:  <b>NOTE:</b> If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.			✓	

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			<b>Section 722.134: Accumulation Time</b>		<input checked="" type="checkbox"/>		
					<p><b>NOTE:</b> A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p>				
			a1		<p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;"><b>and/or</b></p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes _____ No <input checked="" type="checkbox"/></p>				
			a2		<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>				
			a3		<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes _____ No <input checked="" type="checkbox"/></p>				
			a4		<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes _____ No <input checked="" type="checkbox"/></p>				

GEN-C-2(a)


Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p><b>Condition of Containers (Section 725.271)</b></p> <p>Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?  Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p><b>Compatibility of Waste with Container (Section 725.272)</b></p> <p>Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes <input checked="" type="checkbox"/> No ____</p> <p><b>Management of Containers (Section 725.273)</b></p> <p>Are containers of hazardous waste always closed during storage? Yes ____ No <input checked="" type="checkbox"/></p> <p>Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking?  Yes ____ No <input checked="" type="checkbox"/></p> <p><b>Inspections (Section 725.274)</b></p> <p>Is the owner or operator inspecting areas where the containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes ____ No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.</p>				

GEN-C-3




Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Cominent No
			Ltr	Sub Sec		Yes	No		
					<p><b>Special Requirements for Ignitable or Reactive Wastes (Section 725.276)</b></p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Special Requirements for Incompatible Wastes (Section 725.277)</b></p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				


GEN-C-4

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
					<p><b>FOR WASTE IN TANKS,</b> has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below:</p> <p><b>NOTE:</b> If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.</p> <p><b>NOTE:</b> If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.</p> <p><b>Assessment of Existing Tank Systems (Section 725.291)</b></p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available?  Yes ____ No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p> <p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> <li>1) available standards for the tank and ancillary equipment;</li> <li>2) hazardous characteristics of the wastes;</li> <li>3) existing corrosion protection measures;</li> <li>4) age of the tank system; and</li> <li>5) results of a leak test, internal inspection, or other tank integrity examination?</li> </ol> <p>Yes ____ No ____</p>				<p>No assessments</p> 

GEN-C-5

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p><b>Design and Installation of New Tank Systems or Components (Section 725.292)</b></p> <p>Is secondary containment provided for any new tank system (constructed after July 14, 1986) before being put into service?  Yes ____ No ____ N/A <u>✓</u></p> <p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared?  Yes ____ No ____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> <li>1) design standard for tanks and ancillary equipment;  <u>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</u></li> <li>2) hazardous characteristics of the waste; and</li> <li>3) evaluation of potential for corrosion and corrosion protection measures?  Yes ____ No ____</li> </ol> <p>Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)?  Yes ____ No ____</p> <p><b>Containment and Detection of Releases (Section 725.293)</b></p> <p>Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)?  Yes ____ No ____ N/A <u>✓</u></p>				<p>no new tanks</p>  <p>no such wastes</p>

GEN-C-6

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
					<p>For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)?  Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of unknown age, has secondary containment been provided by January 12, 1995?  Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p><u>or</u></p> <p>If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later?  Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87?  Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases?  Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p> <p>Are spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours?  Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				<p>No secondary containment</p> 

GEN-C-7

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
					<p><b>NOTE:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p> <p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> <li>1) a liner (external to the tank); or</li> <li>2) a vault; or</li> <li>3) a double-walled tank; or</li> <li>4) an equivalent device (approved by the Board)?</li> </ol> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p> <p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p> <ol style="list-style-type: none"> <li>1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily;</li> <li>2) welded flanges, joints and connections that are inspected daily;</li> <li>3) sealless or magnetic coupling pumps that are inspected daily; and</li> <li>4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily?</li> </ol> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p>				

GEN-C-8

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p>1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (1)(1) and (2)? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p><b>General Operating Requirements (Section 725.294)</b></p> <p>Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ___ No <input checked="" type="checkbox"/></p> <p>Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ___ No <input checked="" type="checkbox"/> N/A ___</p>				<p>no USTs</p> <p>↓</p> <p>no assessments</p>

GEN-C-9


Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p><b>Inspections (Section 725.295)</b></p> <p>Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)?  Yes _____ No <u>✓</u></p> <p><b>Response to Leaks or Spills and Disposition of Tank Systems (Section 725.296)</b></p> <p>Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use?  Yes <u>✓</u> No _____</p> <p><b>NOTE:</b> If "No", skip to Closure and Post Closure Care (Section 725.297). If "Yes", answer the following questions.</p> <p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <ol style="list-style-type: none"> <li>1) Ceased using, stopped inflow of wastes?  Yes <u>✓</u> No _____</li> <li>2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours?  Yes _____ No <u>✓</u></li> <li>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water?  Yes _____ No <u>✓</u></li> </ol>				

GEN-C-10

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>4) Reported to the Agency within 24 hours of detection? Yes _____ No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes _____ No <input checked="" type="checkbox"/></p> <p>If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> If the component is above ground and can be visually inspected then secondary containment is not needed.</p> <p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the certification been submitted within 7 days after returning the tank system to use? Yes _____ No _____ N/A _____</p>				no repairs ↓

GEN-C-11



Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					<p><b>Closure and Post Closure Care (Section 725.297)</b></p> <p><b>NOTE:</b> The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Special Requirements for Ignitable or Reactive Wastes (Section 725.298).</p> <p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?  Yes _____ No _____</p> <p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____</p> <p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?  Yes _____ No _____</p> <p><b>NOTE:</b> Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p> <p><b>Special Requirements for Ignitable or Reactive Wastes (Section 725.298)</b></p> <p>Are ignitable or reactive wastes stored in tanks?  Yes _____ No _____</p> <p><b>NOTE:</b> If "No", skip to Special Requirements for Incompatible Wastes (Section 725.299).</p>				<p>no closure being performed</p>  <p>Undetermined</p>

GEN-C-12

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
					<p>If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react?  Yes ____ No ____</p> <p><b>NOTE:</b> Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>Are there proper protective distances between the waste management area and the facility boundary line?  Yes ____ No ____</p> <p><b>Special Requirements for Incompatible Wastes (Section 725.299)</b></p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated?  Yes ____ No ____ N/A ____</p>				

GEN-C-13

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a2	<p>For waste in containers, has the generator marked and made visisble for inspection on each container, the date upon which accumulation began?  Yes ____ No <input checked="" type="checkbox"/> N/A ____</p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?  Yes ____ No <input checked="" type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below:</p> <p><b>Maintenance and Operation of Facility (Section 725.131)</b></p> <p>Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:</p> <ul style="list-style-type: none"> <li>- Air;</li> <li>- Soil; or</li> <li>- Surface Water,</li> </ul> <p>which would threaten human health or the environment?  Yes ____ No <input checked="" type="checkbox"/></p>				

GEN-C-14

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p><b>Required Equipment (Section 725.132)</b></p> <p>Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:</p> <ul style="list-style-type: none"> <li>- An internal communications or alarm system capable of providing immediate emergency instructions? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> </ul> <p><b>NOTE:</b> Any "N/A" answers must be explained in the Remarks column.</p>				

GEN-C-15

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p><b>Testing and Maintenance of Equipment (Section 725.133)</b></p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> <li>- Communications/alarm systems? Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>- Fire protection equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>- Spill control equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>- Decontamination equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> </ul> <p><b>NOTE:</b> Any "N/A" answer must be explained in the Comments.</p> <p><b>Access to Communications or Alarm Systems (Section 725.134)</b></p> <p>Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 735.132? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				no such equipment

GEN-C-16

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p><b>Required Aisle Space (Section 725.135)</b></p> <p>Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?  Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p><b>NOTE: Document non-compliance with photograph.</b></p> <p><b>Arrangements with Local Authorities (Section 725.137)</b></p> <p>Has the owner or operator made or attempted to make the following arrangements, as appropriate for the type of waste handled at this facility and the potential need for the services of these organizations:</p> <p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes?  Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority?  Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>				

GEN-C-17

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes _____ No <input checked="" type="checkbox"/> NA _____</p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p><b>NOTE: Any "N/A" answer must be explained in the Comments.</b></p> <p>Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart D: Contingency Plan and Emergency Procedures listed below:</p> <p><b>Purpose and Implementation of Contingency Plan (Section 725.151)</b></p> <p>Is a plan available? Yes _____ No <input checked="" type="checkbox"/></p> <p><b>NOTE: If answer is "No", skip to Emergency Coordinator (Section 725.155).</b></p>				no contingency plan ↓

GEN-C-18

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ____ No ____</p> <p>Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ____ No ____ N/A ____</p> <p><b>Content of Contingency Plan (Section 725.152)</b></p> <p>Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:</p> <p>1) Fires? Yes ____ No ____</p> <p>2) Explosions? Yes ____ No ____</p> <p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ____ No ____</p> <p>Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes ____ No ____</p> <p>2) Hospitals? Yes ____ No ____</p> <p>3) Contractors? Yes ____ No ____</p> <p>4) State and local emergency response teams? Yes ____ No ____</p>				

GEN-C-19

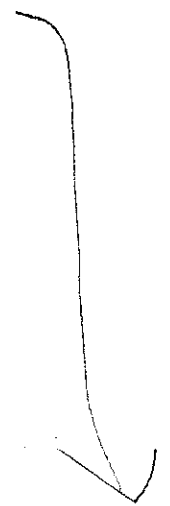



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes _____ No _____</p> <p>Is the list of emergency coordinators up-to-date? Yes _____ No _____</p> <p>If more than one person is designated as an emergency coordinator, is a primary coordinator identified? Yes _____ No _____</p> <p>Does the plan identify:</p> <ol style="list-style-type: none"> <li>1) A list and physical description of all emergency equipment at the facility? Yes _____ No _____</li> <li>2) A brief outline of the capability of each piece of emergency equipment? Yes _____ No _____</li> <li>3) The location of each piece of emergency equipment? Yes _____ No _____</li> </ol> <p>Is the list of emergency equipment up-to-date? Yes _____ No _____</p> <p>Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes _____ No _____ N/A _____</p>				

GEN-C-20

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
					<p>Does the plan identify the signal to be used to begin evacuation? Yes _____ No _____</p> <p>Are alternate evacuation routes identified? Yes _____ No _____</p> <p><b>Copies of Contingency Plan (Section 725.153)</b></p> <p>Has a copy (and all revisions) of the contingency plan:</p> <p>a) Been maintained at the facility? Yes _____ No _____</p> <p>b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes _____ No _____</p> <p><b>Amendment of Contingency Plan (Section 725.154)</b></p> <p>Has the contingency plan been reviewed and, if necessary, amended whenever:</p> <p>1) Applicable regulations are revised? Yes _____ No _____</p> <p>2) The plan fails in an emergency? Yes _____ No _____ N/A _____</p>				

GEN-C-21

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes in the response necessary in an emergency? Yes ____ No ____ N/A ____</p> <p>4) The list of emergency coordinators changes? Yes ____ No ____</p> <p>5) The list of emergency equipment changes? Yes ____ No ____</p> <p><b>Emergency Coordinator (Section 725.155)</b></p> <p>Is there an emergency coordinator on-site or on call at all times? Yes ____ No <u>✓</u></p> <p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes ____ No ____</p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes ____ No ____</p>				 <p>no EC</p> 

GEN-C-22

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p><b>Emergency Procedures (Section 725.156)</b></p> <p>Has the facility had a release, fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column of 722.134.</p> <p>a4 Has the generator complied with the requirements of 35 Ill. Adm. Code 725.116: Personnel Training listed below:</p> <p><b>Personnel Training (Section 725.116)</b></p> <p>Does the facility have a training program? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> If "No", skip to Subsection (c)1 page GEN-C-26.</p> <p>Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input type="checkbox"/> No <input type="checkbox"/></p>		<input checked="" type="checkbox"/>		<p>many releases - contamination in many areas.</p> <p>no personnel training</p>

GEN-C-23

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Does the program cover, at a minimum:</p> <p>1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ____ No ____ N/A ____</p> <p>2) Key parameters for automatic waste feed cut-off systems? Yes ____ No ____ N/A ____</p> <p>3) Communications or alarm systems? Yes ____ No ____</p> <p>4) Response to fire or explosion? Yes ____ No ____</p> <p>5) Response to groundwater contamination incidents? Yes ____ No ____ N/A ____</p> <p>Does the program cover the implementation of the contingency plan? Yes ____ No ____</p> <p>Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ____ No ____ N/A ____</p> <p>Has the facility conducted an annual review of the initial training? Yes ____ No ____ N/A ____</p>				

GEN-C-24

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ____ No ____</li> <li>2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ____ No ____</li> <li>3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ____ No ____</li> <li>4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ____ No ____</li> </ol> <p>Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ____ No ____ N/A ____</p>				

GEN-C-25

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	2				<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart D: Recordkeeping and Reporting</b>  <b>Section 722.140: Recordkeeping</b>  Has the generator retained for a period of three years:				no manifests used  none filed  no analyses done
					a - A copy of each signed manifest? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					b - A copy of each annual report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					b - A copy of each exception report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					c - Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					d Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
					d If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

GEN-D-1

Area	Class	90 Day F/U Req	Key Lu	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p><b>Section 722.141: Annual Reporting</b></p> <p>Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?</p> <p><b>NOTE:</b> A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.</p>			✓	no waste shipped off site
MAN	1			<p><b>Section 722.142: Exception Reporting</b></p> <p>a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____</p> <p>b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____</p> <p>b Does any exception report submitted to the Director contain the following:</p> <ul style="list-style-type: none"> <li>- A legible copy of the manifest for which the generator does not have confirmation of delivery; and</li> </ul>			✓	


GEN-D-2




Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p> <p><b>Section 722.143: Additional Reporting</b></p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>			✓	

GEN-D-3



Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart B: General Facility Standards</b>				USEPA assigned IWL# number because they consider them a disposal facility, but no 8700-12 was ever filed.
OIH	1			<b>Section 725.111: USEPA Identification Number</b>  Has the facility obtained a USEPA identification number?		✓		
OTH	1			<b>Section 725.112: Required Notices</b>  a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A ✓			✓	
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A ✓				
OTH	1			<b>Section 725.113: General Waste Analysis</b>  a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes ____ No ✓		✓		no analyses 


TSD-B-1

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes ____ No <input checked="" type="checkbox"/>				 no plan
			a3	Has the analysis been repeated:  A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed?  Yes ____ No ____ N/A ____  B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes ____ No ____ N/A ____				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes ____ No <input checked="" type="checkbox"/>				
				NOTE: If "No", skip to 725.114.  Is the written waste analysis plan available at the facility? Yes ____ No ____				

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes _____ No _____</p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes _____ No _____</p> <p>2) The test methods which will be used to test for those parameters? Yes _____ No _____</p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes _____ No _____</p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes _____ No _____</p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes _____ No _____</p>				

TSD-B-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> <li>- 725.293 (Tanks);</li> <li>- 725.325 (Surface Impoundments);</li> <li>- 725.352 (Waste Piles);</li> <li>- 725.373 (Land Treatment);</li> <li>- 725.414 (Incinerators);</li> <li>- 725.475 (Thermal Treatment);</li> <li>- 725.502 (Chem. Phys. Bio. Treat.)</li> </ul> <p>Yes _____ No _____ N/A _____</p> <p><b>NOTE:</b> Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes _____ No _____ N/A _____</p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes _____ No _____ N/A _____</p> <p><b>Section 725.114: Security</b></p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes _____ No <input checked="" type="checkbox"/></p>				
OTH	1	X							

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does a non-exempt facility have either:</p> <p>b      1)    A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility?  Yes _____ No <input checked="" type="checkbox"/></p> <p style="text-align: center;">OR</p> <p>b      2)    An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility?  Yes <input checked="" type="checkbox"/> No _____</p> <p>c      Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion?  Yes _____ No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5





Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> <li>- 725.274 (Containers);</li> <li>- 725.294 (Tanks);</li> <li>- 725.326 (Surface Impoundments);</li> <li>- 725.447 (Incinerators);</li> <li>- 725.477 (Thermal Treatment);</li> <li>- 725.503 (Chem. Phys. Bio. Treat.)</li> </ul> <p>Yes ____ No ____ N/A ____</p> <p><b>NOTE: Circle the applicable section.</b></p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes ____ No <input checked="" type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes ____ No <input checked="" type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> <li>- The date and time of the inspection? Yes ____ No ____</li> <li>- The name of the inspector? Yes ____ No ____</li> </ul>				<p>no records</p>

TSD-B-7

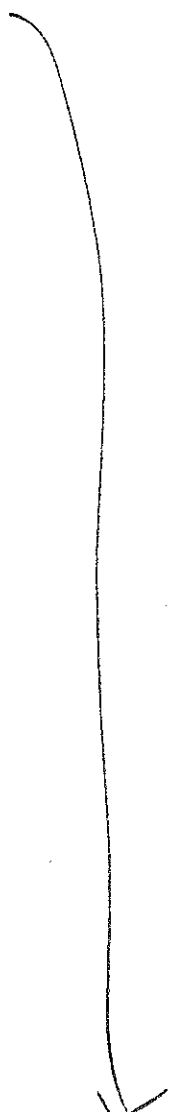
Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				<ul style="list-style-type: none"> <li>- A notation of the observations made? Yes ____ No ____</li> <li>- The date and nature of any type of corrective action? Yes ____ No ____ N/A ____</li> </ul>				<p>↓</p> <p>no training</p> <p>↓</p>
					<p><b>Section 725.116: Personnel Training</b></p> <p>Does the facility have a training program? Yes ____ No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ____ No ____</p> <p>Is the training program formalized, i.e., written down? Yes ____ No ____</p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ____ No ____</p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ____ No ____ N/A ____</p>				

Area	Class	90 Day F.U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>B) Key parameters for automatic waste feed cutoff systems? Yes ____ No ____ N/A ____</p> <p>C) Communications or alarm systems? Yes ____ No ____ N/A ____</p> <p>D) Response to fire or explosion? Yes ____ No ____ N/A ____</p> <p>E) Response to ground water contamination incidents? Yes ____ No ____ N/A ____</p> <p>Does the program cover the implementation of the contingency plan? Yes ____ No ____</p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ____ No ____ N/A ____</p> <p>c Has the facility conducted an annual review of the initial training? Yes ____ No ____ N/A ____</p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ____ No ____</p>				

TSD-B-9

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No		
			Sub Sec		Yes	No				
OTH	1	X		<p>2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ____ No ____</p> <p>3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ____ No ____</p> <p>4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes ____ No ____</p>				<p style="text-align: center;">↓</p> <p>Undetermined if such wastes are generated.</p> <p style="text-align: center;">↓</p>		
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ____ No ____ N/A ____						
			<b>Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes</b>							
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes ____ No ____						
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ____ No ____						

TSD-B-10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes ____ No ____				
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:				
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes ____ No ____				
				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes ____ No ____				
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes ____ No ____				
				4) Damage the structural integrity of the device or facility containing the waste? Yes ____ No ____				
				5) Through other like means threaten human health or the environment? Yes ____ No ____				

TSD-B-11

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p><b>Section 725.118: Location Standards</b></p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p><b>NOTE:</b> A "Yes" answer is a violation of the location standard.</p>				

TSD-B-12

Area	Class	90 Day F.U. Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	1	X			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF</b> <b>HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart C: Preparedness and Prevention</b>  <b>Section 725.131: Maintenance and Operation of Facility</b>  Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> <li>- Air;</li> <li>- Soil; or</li> <li>- Surface water,</li> </ul> which would threaten human health or the environment? Yes ____ No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
OTH	1	X			<b>Section 725.132: Required Equipment</b>  Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> <li>a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes ____ No <input checked="" type="checkbox"/> N/A ____</li> <li>b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes ____ No <input checked="" type="checkbox"/> N/A ____</li> </ul>		<input checked="" type="checkbox"/>		

TSD-C-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	<ul style="list-style-type: none"> <li>- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> </ul>				<p>no such equipment</p> <p>↓</p>
			d	<ul style="list-style-type: none"> <li>- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p><b>NOTE: Any "N/A" answers must be explained in the Remarks column.</b></p> <p><b>Section 725.133: Testing and Maintenance of Equipment</b></p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> <li>- Communications/alarm systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>- Fire protection equipment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>- Spill control equipment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>- Decontamination equipment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> </ul> <p><b>NOTE: Any "N/A" answer must be explained in the Comments.</b></p>				

TSD-C-2



Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<b>Section 725.134: Access to Communications or Alarm Systems</b>  a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes ____ No <input checked="" type="checkbox"/> N/A ____  b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes ____ No ____ N/A <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		
OTH	1	X		<b>Section 725.135: Required Aisle Space</b>  Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?		<input checked="" type="checkbox"/>		
OTH	2			<b>Section 725.137: Arrangements with Local Authorities</b>  a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:		<input checked="" type="checkbox"/>		

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p><b>NOTE: Any "N/A" answer must be explained in the Comments.</b></p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				

TSD-C-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Ser		Yes	No		
OTH	1			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF</b> <b>HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart D: Contingency Plan and Emergency Procedures</b>  <b>Section 725.151: Purpose and Implementation of Con-</b> <b>tingency Plan</b>  a Is a plan available? Yes _____ No <input checked="" type="checkbox"/>  <b>NOTE: If the answer is "No", skip to 725.155.</b>  a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazard- ous waste constituents to air, soil, or surface waters? Yes _____ No _____  b Have the provisions of the plan been carried out immedi- ately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes _____ No _____ N/A _____		<input checked="" type="checkbox"/>		no plan
OTH	2			<b>Section 725.152: Content of Contingency Plan</b>  a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:  1) Fires? Yes _____ No _____  2) Explosions? Yes _____ No _____				

TSD-D-1

Area	Class	90 Day F/U Req	Key Lit	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes ____ No ____</p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes ____ No ____</p> <p>2) Hospitals? Yes ____ No ____</p> <p>3) Contractors? Yes ____ No ____</p> <p>4) State and local emergency response teams? Yes ____ No ____</p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes ____ No ____</p> <p>d Is the list of emergency coordinators up-to-date? Yes ____ No ____</p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes ____ No ____</p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes ____ No ____</p>				


TSD-D-2

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.		
			Lu Sub Sec		Yes	No				
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes ____ No ____						
				3) The location of each piece of emergency equipment? Yes ____ No ____						
			e	Is the list of emergency equipment up-to-date? Yes ____ No ____						
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes ____ No ____ N/A ____						
			f	Does the plan identify the signal to be used to begin evacuation? Yes ____ No ____						
			f	Are alternate evacuation routes identified? Yes ____ No ____						
			<b>Section 725.153: Copies of Contingency Plan</b>							
			a	Has a copy (and all revisions) of the contingency plan:						
				a) Been maintained at the facility? Yes ____ No ____						
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ____ No ____						

TSD-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<b>725.154: Amendment of Contingency Plan</b>			✓	
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes ____ No ____				
			b	2) The plan fails in an emergency? Yes ____ No ____ N/A ____				
			c	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ____ No ____ N/A ____				
			d	4) The list of emergency coordinators changes? Yes ____ No ____				
			e	5) The list of emergency equipment changes? Yes ____ No ____				
OTH	2			<b>Section 725.155: Emergency Coordinator</b>			✓	no EC
				Is there an emergency coordinator on-site or on-call at all times? Yes ____ No <input checked="" type="checkbox"/>				

TSD-D-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes _____ No _____</p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes _____ No _____</p> <p><b>Section 725.156: Emergency Procedures</b></p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input checked="" type="checkbox"/> No _____</p> <p><b>NOTE:</b> If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>				 <p>1) Release of red waste material into drains which lead to sewer.</p> <p>2) Release from "tank" (Bld. G + F) into Bld. P</p> <p>No action taken for either incident.</p>

TSD-D-5





Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste?  Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>Does the facility initiate shipments of hazardous waste?  Yes ____ No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p><b>Section 725.172: Manifest Discrepancies</b></p> <p><b>NOTE:</b> If there are no manifest discrepancies, mark the "N/A" column.</p>			<input checked="" type="checkbox"/>	no manifests.
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery?  Yes ____ No ____</p> <p>d If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue?  Yes ____ No ____</p>				

TSD-E-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<b>Section 725.173: Operating Record</b>		<input checked="" type="checkbox"/>		no operating record
			a	Does the owner or operator have a written operating record at the facility? Yes ____ No <input checked="" type="checkbox"/>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes ____ No ____				
			b	Does the operating record contain the following information:				
			1)	A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes ____ No ____				
			2)	A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes ____ No ____				
			3)	The location of each hazardous waste within the facility? Yes ____ No ____				
			4)	The quantity of each hazardous waste at each location within the facility? Yes ____ No ____				
			5)	For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes ____ No ____ N/A ____				


TSD-E-3

Area	Class	90 Day F.U. Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
					<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes _____ No _____ N/A _____</p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> <li>- 725.113 (Gen. Waste Analysis)? Yes _____ No _____</li> <li>- 725.293 (Tanks)? Yes _____ No _____ N/A _____</li> <li>- 725.325 (Surface Improvements)? Yes _____ No _____ N/A _____</li> <li>- 725.352 (Waste Piles)? Yes _____ No _____ N/A _____</li> <li>- 725.373 (Land Treatment)? Yes _____ No _____ N/A _____</li> <li>- 725.441 (Incinerators)? Yes _____ No _____ N/A _____</li> <li>- 725.475 (Thermal Treatment)? Yes _____ No _____ N/A _____</li> <li>- 725.502 (Chem., Phys., Bio. Treatment)? Yes _____ No _____ N/A _____</li> </ul> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes _____ No _____ N/A _____</p>				

TSD-E-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes ____ No ____</p> <p><b>NOTE:</b> The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> <li>- 725.190 (G.W. Monitoring)? Yes ____ No ____ N/A ____</li> <li>- 725.194 (G.W. Monitoring)? Yes ____ No ____ N/A ____</li> <li>- 725.376 (Land Treatment)? Yes ____ No ____ N/A ____</li> <li>- 725.378 (Land Treatment)? Yes ____ No ____ N/A ____</li> <li>- 735.380(d)(1) (Land Treatment)? Yes ____ No ____ N/A ____</li> <li>- 725.447 (Incinerators)? Yes ____ No ____ N/A ____</li> <li>- 725.477 (Thermal Treatment)? Yes ____ No ____ N/A ____</li> </ul> <p><b>NOTE:</b> Data required under 725.194 must be kept throughout the post-closure period.</p>				

TSD-E-5

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes _____ No _____ N/A _____  12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes _____ No _____ N/A _____				  no closure @ this time
				<b>Section 725.174: Availability, Retention and Disposition of Records</b>  a During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes _____ No <input checked="" type="checkbox"/> N/A _____  c Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to:  - The Agency? Yes _____ No _____  - The local land authority? Yes _____ No _____ N/A _____  b Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				

TSD-E-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<b>Section 725.175: Annual Report</b>  Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?		<input checked="" type="checkbox"/>		Have accepted totes filled w/ waste in the past. Waste Material is still on-site
OTH	1			<b>Section 725.176: Unmanifested Waste Report</b>  Does the facility accept hazardous waste from off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  <b>NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.</b>  Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  <b>NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:</b>  Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		





TSD-E-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.		
			Sub Sec		Yes	No				
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste?  Yes ____ No <input checked="" type="checkbox"/></p>						
				<p><b>Section 725.177: Additional Reports</b></p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>						
			a	<p>1) Releases, fires, explosions as specified in Section 725.156?  Yes ____ No <input checked="" type="checkbox"/> N/A ____</p>						
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194?  Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>						
			c	<p>3) Facility closure as specified in Section 725.215?  Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>						

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subparts G and H: Closure, Post-Closure and Financial Requirements</b>				no closure plan
			a	<b>Section 725.212: Closure Plan</b>  Was the most current facility closure plan available during the inspection? Yes _____ No <u>✓</u>  Was the closure plan submitted to the Agency within the time frames specified below:  <ul style="list-style-type: none"> <li>- At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin?                Yes _____ No _____ N/A _____</li> <li>- At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)?                Yes _____ No _____ N/A _____</li> <li>- At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)?                Yes _____ No _____ N/A _____</li> <li>- At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan?                Yes _____ No _____ N/A _____</li> </ul>		✓		

TSD-G/H-1



Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
CLO	1				<ul style="list-style-type: none"> <li>- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes ____ No ____ N/A ____</li> <li>- No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes ____ No ____ N/A ____</li> </ul> <p><b>Section 725.218: Post-Closure Plan</b></p> <p>a Was the most current facility post-closure plan available during the inspection? Yes ____ No ____</p> <p>Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes ____ No ____ N/A ____</p>				 <p>none necessary</p> 
FIN	1				<p><b>Section 725.242: Cost Estimate for Closure</b></p> <p>Has the facility prepared a written estimate of the cost of closing the facility?</p>				
FIN	1				<p><b>Section 725.244: Cost Estimate for Post-Closure Care</b></p> <p>Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?</p> <p><u>NOTE:</u> If no post-closure plan, mark "N/A".</p>				 <p>none necessary</p>

TSD-G/H-2


Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1	X			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF</b> <b>HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart I: Use and Management of Container</b>				
					<b>Section 725.271: Condition of Containers</b>  Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?		✓		
OTH	1	X			<b>Section 725.272: Compatibility of Waste with Containers</b>  Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	✓			
					<b>Section 725.273: Management of Containers</b>  a Are containers of hazardous waste always closed during storage? Yes _____ No <u>✓</u>				
OTH	1	X			b Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No <u>✓</u>				
OTH	2				<b>Section 725.274: Inspections</b>  Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes _____ No <u>✓</u>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<p><b>NOTE:</b> Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p><b>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</b></p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>	✓			
				<p><b>Section 725.277: Special Requirements for Incompatible Wastes</b></p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>			✓	

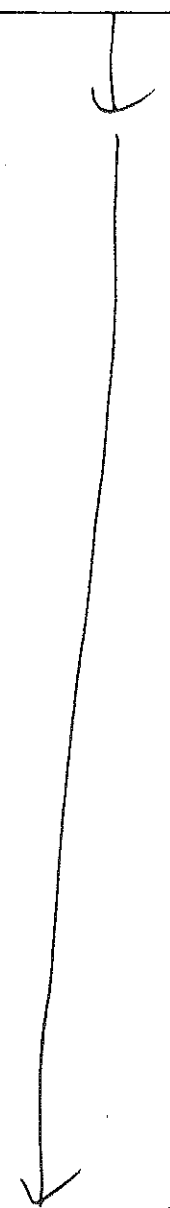
TSD-I-2

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr		Yes	No		
OTH	2			<p><b>PART 725</b>  <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF</b>  <b>HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b>  <b>Subpart J: Tank Systems</b></p> <p><b>Section 725.290: Applicability</b></p> <p>Does the facility store or treat hazardous waste in tanks?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If "No", skip Subpart J.</p> <p><b>NOTE:</b> Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.</p> <p>Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> Failing the filter test means that the waste contains free liquids.</p>				<p>NO assessment</p>
			a	<p><b>Section 725.291: Assessment of Existing Tank Systems</b></p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p>				


TSD-J-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> <li>1) available standards for the tank and ancillary equipment;</li> <li>2) hazardous characteristics of the wastes;</li> <li>3) existing corrosion protection measures;</li> <li>4) age of the tank system; and</li> <li>5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____</li> </ol> <p><b>Section 725.292: Design and Installation of New Tank Systems or Components</b></p>				
			a	<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ____ No ____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> <li>1) design standards for tanks and ancillary equipment;</li> </ol> <p><b>NOTE:</b> These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> <li>2) hazardous characteristics of the waste; and</li> <li>3) evaluation of potential for corrosion and corrosion protection measures? Yes ____ No ____</li> </ol>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____				no secondary containment
				<b>Section 725.293: Containment and Detection of Releases</b>				
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				<u>or</u> If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes _____ No <input checked="" type="checkbox"/> N/A _____				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A <input checked="" type="checkbox"/>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes _____ No _____ N/A _____</p> <p><b>NOTE:</b> To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p><b>NOTE:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ul style="list-style-type: none"> <li>1) a liner (external to the tank); or</li> <li>2) a vault; or</li> <li>3) a double-walled tank; or</li> <li>4) an equivalent device (approved by the Board)?</li> </ul> <p>Yes _____ No _____ N/A _____</p> <p><b>NOTE:</b> Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				

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Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
					1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily;  2) welded flanges, joints and connections that are inspected daily;  3) sealless or magnetic coupling pumps that are inspected daily; and  4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes _____ No _____ N/A _____				
					i Until such time as secondary containment is provided, are the following requirements being met for all tank systems:  1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes _____ No <input checked="" type="checkbox"/> N/A _____				

TSD-J-5




Area	Class	30 Day FUI Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes ___ No <input checked="" type="checkbox"/></p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ___ No <input checked="" type="checkbox"/></p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ___ No <input checked="" type="checkbox"/></p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes ___ No <input checked="" type="checkbox"/></p> <p><b>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</b></p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ___ No <input checked="" type="checkbox"/></p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p><b>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</b></p>				

TSD-J-7

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<b>Section 725.294: General Operating Requirements</b>  b1&2 Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ____ No <u>✓</u>  b3 Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes ____ No ____ N/A <u>✓</u>  c If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ____ No <u>✓</u> N/A ____		<u>✓</u>		
OTH	2			<b>Section 725.295: Inspections</b>  c Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes ____ No <u>✓</u>		<u>✓</u>		
OTH	1	X		<b>Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems</b>  Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <u>✓</u> No ____  <b>NOTE:</b> If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).		<u>✓</u>		

TSD-J-6

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p><b>Section 725.297: Closure and Post Closure Care</b></p> <p><b>NOTE:</b> The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>				<p>no closure is being performed</p> 
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes ___ No ___</p> <p>a Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes ___ No ___</p> <p>b If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes ___ No ___</p> <p><b>NOTE:</b> Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>				

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Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	1				<p><b>Section 725.298: Special Requirements for Ignitable or Reactive Wastes</b></p> <p>Are ignitable or reactive wastes stored in tanks? Yes ____ No ____</p> <p><b>NOTE:</b> If "No", skip to Section 725.299.</p> <p>a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ____ No ____</p> <p><b>NOTE:</b> Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>b Are there proper protective distances between the waste management area and the facility boundary line? Yes ____ No ____</p>				Undetermined
OTH	1				<p><b>Section 725.299: Special Requirements for Incompatible Wastes</b></p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				

TSD-J-9

Area	Class	90 Day F L Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<b>Section 725.300: Waste Analysis and Trial Tests</b>  In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:			✓	
			a	1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____  or				
			b	2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____  <b>NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.</b>				

TSD-J-10



RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: 1101 Industries  
 U.S. EPA ID No.: 14D097179204 / 0311740003  
 Street: 7738 West 61st Place  
 City: Summit State: IL Zip: 60501  
 Telephone: 708-458-8700

Inspection Date: 11/24/92 Time: 9:30-12 (am/pm)

Weather Conditions: 45° Cloudy

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Tina Kowaszny</u>	<u>EPA-EPS</u>	<u>708-531-5900</u>
	<u>Gino Bruni</u>	<u>↓</u>	<u>↓</u>

Facility Representatives: \_\_\_\_\_

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	_____
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	_____	_____	_____	_____	_____

\* See Appendix A

**INSPECTION SUMMARY**

**Processes That Generate LDR Wastes:**

*See  
narrative*

**LDR Waste Management:**

**Summary:**

**Signature:**

*Tina Kovasznaus*



5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes \_\_\_ No \_\_\_ NA \_\_\_

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator\* - 180) days, or disposed on site?

Yes ☒ No \_\_\_

(If yes, the TSD Checklist must also be completed.)

\* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments \_\_\_\_\_

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes \_\_\_ No \_\_\_ NA \_\_\_

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?\* [40 CFR 268.9(d)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

\*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes \_\_\_ No \_\_\_ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

0/19

Does the generator provide a notification to the treatment or storage facility?  
[40 CFR 268.7(a)(1)]

Yes \_\_\_ No \_\_\_ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes \_\_\_ No \_\_\_ NA \_\_\_

b. Is a notification sent with each waste shipment?

Yes \_\_\_ No \_\_\_

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes \_\_\_ No \_\_\_ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes \_\_\_ No \_\_\_

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes \_\_\_ No \_\_\_ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes \_\_\_ No \_\_\_ (If No, go to d.)

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?\*

Yes ☐ No ☐ NA ☐

\*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

### C. Storage [40 CFR 268.50]

1. Are prohibited\* wastes stored on site in containers?

Yes ☒ No ☐ (If No, go to 2.)

\*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☐ No ☒

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☒ No ☐ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☒

If yes, state how: \_\_\_\_\_

2. Are prohibited wastes stored on site in tanks?

Yes ☒ No ☐ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☐ No ☒

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☒ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes \_\_\_ No ☒

If yes, state how: \_\_\_\_\_

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes \_\_\_ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes \_\_\_ No \_\_\_

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes \_\_\_ No \_\_\_

#### D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes \_\_\_ No \_\_\_ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes \_\_\_ No \_\_\_ NA \_\_\_ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes \_\_\_ No \_\_\_

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

1LD 097 179 204

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

RECEIVED  
WMD RECORDS SECTION

OCT 12 1985

DATE: MAR 31 1992

SUBJECT: IWI Industries  
Non-notifier

FROM: Joseph M. Boyle, Chief and Karl E. Bremer, Chief  
RCRA Enforcement Branch RCRA Permitting Branch

TO: Sally K. Swanson, Chief  
RCRA Program Management Branch

Please add IWI Industries to the Land Disposal Universe. The Illinois Environmental Protection Agency (IEPA) has been notified of this addition in a letter to Mr. William C. Child. Facts that support the position assumed by the United States Environmental Protection Agency (U.S. EPA) are as follows:

- 1) The facility manufactures tank spray nozzles, tank and drum washers and bulk liquid shipping tanks. Damaged tanks are also repaired at the facility after removing the paint residues by cleaning. The liquid rinse and the sludge generated during cleaning operations are stored in above-ground tanks. According to IEPA, the facility also places sludge on waste piles on the floor inside the building. The waste piles occupy several entire rooms and the waste is poorly contained as it reaches the window sills. IEPA has sampled and analyzed the sludge from the waste piles. The results have indicated that the sludge contains the hazardous wastes F002, F003, F005, D006, D007, and D008.
- 2) The facility has not given notification to U.S. EPA for its hazardous waste management activities. Therefore, the date the waste piles were created has not been documented. However, there is evidence that waste has been added to the waste piles after August 2, 1984, which is the date the waste piles were initially documented.

If you have any questions about this issue, please contact Ms. Mirtha Capiro of my staff at 886-7567.

cc: S. Sylvester

1LD 097 179 204

IWI Industries  
7738 W. 161st Pl.  
Summit, IL 60501



ILD097179204

**Illinois Environmental Protection Agency  
Division of Land Pollution Control**

**RCRA INSPECTION REPORT**

USEPA #: IL <u>NONE</u>	EPA #: <u>0311740003</u>
Facility Name: <u>IWI INDUSTRIES</u>	Phone #: <u>708 456-8700</u>
Street Address: <u>7735 W 61st PLACE</u>	County: <u>COOK</u>
City: <u>SUMMIT</u>	State: <u>IL</u> Zip: <u>60501</u>
Region: <u>MAYWOOD</u>	Inspection Date: <u>5/7/90</u> From: <u>10:30 A</u> To: <u>10:37 A</u>
Weather: <u>DRY</u>	

**TYPE OF FACILITY**

Notified As: <u>NON-NOTIFIER</u>	Regulated As: <u>G/S</u>
LDF? <u>N</u> HPV? <u>N</u> <small>(Yes or No)</small>	90-Day F/U Required?: YES <u>      </u> NO <u>X</u>

**TYPE OF INSPECTION**

CEI: <u>✓</u>	Sampling: <u>      </u>	Citizen Complaint: <u>      </u>	Closed: <u>      </u>	Other: <u>      </u>
CME/O&M: <u>      </u>	Record Review: <u>      </u>	Follow-Up to Inspection of: <u>      </u>	Withdrawal: <u>      </u>	

**NON-REGULATED STATUS**

SQG: <u>      </u>	Claimed Nonhandler: <u>      </u>	Other (Specify in Narrative): <u>      </u>
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**PART A NON-FILER**

Notification Date: <u>      </u> / <u>      </u> / <u>      </u>	from (initial) or (subsequent) Notification.
Initial Part A Date: <u>      </u> / <u>      </u> / <u>      </u>	Amended: <u>      </u> / <u>      </u> / <u>      </u>
Part A Withdrawal requested: <u>      </u> / <u>      </u> / <u>      </u>	Approved by (US)(IL) EPA: <u>      </u> / <u>      </u> / <u>      </u>

**PART B PERMIT APPLICATION**

Part B Permit Submitted: Y or N <u>      </u> / <u>      </u> / <u>      </u>	Final Permit Issued: <u>      </u> / <u>      </u> / <u>      </u>
---	--

**ENFORCEMENT**

Has the firm been referred to --	USEPA: Y or <u>(N)</u> <u>      </u> / <u>      </u> / <u>      </u>
Illinois Attorney General: <u>(Y)</u> or N <u>      </u> / <u>      </u> / <u>      </u>	County State's Attorney: <u>(Y)</u> or N <u>      </u> / <u>      </u> / <u>      </u>

**ORDERS ISSUED**

CACO: <u>      </u> / <u>      </u> / <u>      </u>	CAFO: <u>      </u> / <u>      </u> / <u>      </u>	Consent Decree: <u>      </u> / <u>      </u> / <u>      </u>
Federal Court Order: <u>      </u> / <u>      </u> / <u>      </u>	State Court Order: <u>8</u> / <u>12</u> / <u>85</u>	IPCB Order: <u>      </u> / <u>      </u> / <u>      </u>

**TSD FACILITY ACTIVITY SUMMARY**

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report		
							19 89	19 88	19 87
S01	NON NOTIFIER	UNKNOWN	Y	N	UNKNOWN	—	N	N	N
S02	↓	UNKNOWN	Y	N	UNKNOWN	—	N	N	N

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21 MAY 1990

IEPA/DLPC





**OWNER****OPERATOR**

Name <u>GLENN WELLMAN</u>	Name <u>IWI INDUSTRIES</u>
Address <u>7735 W 61ST PLACE</u>	Address <u>7735 W 61ST PLACE</u>
City <u>SUMMIT</u>	City <u>SUMMIT</u>
State <u>IL</u> Zip <u>60501</u>	State <u>IL</u> Zip <u>60501</u>
Phone # <u>708 458-8700</u>	Phone # <u>708 458-8700</u>

**PERSON(S) INTERVIEWED****TITLE****PHONE #**

<u>GLENN WELLMAN</u>	<u>OWNER</u>	<u>708 458-8700</u>

**INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

<u>RICH FINLEY</u>	<u>IEPA / EPS 3</u>	<u>708 345-9780</u>

**PREPARED BY****AGENCY/TITLE****PHONE #**

<u>RICH FINLEY</u>	<u>IEPA / EPS 3</u>	<u>708 345-9780</u>
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**SUMMARY OF APPARENT VIOLATIONS**

Area	Class	Section

Area	Class	Section

Area	Class	Section

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NARRATIVE

I. What the company manufactures or services  
performed builds, repairs, and tests tote tanks.

II. Wastes generated by the company - see comments

A. HAZARDOUS WASTES

Name \_\_\_\_\_ EPA H.W.# \_\_\_\_\_ Process \_\_\_\_\_  
Rate of Generation \_\_\_\_\_ Disposition \_\_\_\_\_  
How is waste handled \_\_\_\_\_ Shipment frequency \_\_\_\_\_  
Amt on site \_\_\_\_\_ Accumulate/Stored in \_\_\_\_\_

Name \_\_\_\_\_ EPA H.W.# \_\_\_\_\_ Process \_\_\_\_\_  
Rate of Generation \_\_\_\_\_ Disposition \_\_\_\_\_  
How is waste handled \_\_\_\_\_ Shipment frequency \_\_\_\_\_  
Amt on site \_\_\_\_\_ Accumulate/Stored in \_\_\_\_\_

Name \_\_\_\_\_ EPA H.W.# \_\_\_\_\_ Process \_\_\_\_\_  
Rate of Generation \_\_\_\_\_ Disposition \_\_\_\_\_  
How is waste handled \_\_\_\_\_ Shipment frequency \_\_\_\_\_  
Amt on site \_\_\_\_\_ Accumulate/Stored in \_\_\_\_\_

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B. NON-HAZARDOUS WASTES - see comments

Name \_\_\_\_\_ Process \_\_\_\_\_

Rate of Generation \_\_\_\_\_ Disposition \_\_\_\_\_

How is waste handled \_\_\_\_\_ Shipment frequency \_\_\_\_\_

Amt on site \_\_\_\_\_ Accumulate/Stored in \_\_\_\_\_

Name \_\_\_\_\_ Process \_\_\_\_\_

Rate of Generation \_\_\_\_\_ Disposition \_\_\_\_\_

How is waste handled \_\_\_\_\_ Shipment frequency \_\_\_\_\_

Amt on site \_\_\_\_\_ Accumulate/Stored in \_\_\_\_\_

Name \_\_\_\_\_ Process \_\_\_\_\_

Rate of Generation \_\_\_\_\_ Disposition \_\_\_\_\_

How is waste handled \_\_\_\_\_ Shipment frequency \_\_\_\_\_

Amt on site \_\_\_\_\_ Accumulate/Stored in \_\_\_\_\_

Name \_\_\_\_\_ Process \_\_\_\_\_

Rate of Generation \_\_\_\_\_ Disposition \_\_\_\_\_

How is waste handled \_\_\_\_\_ Shipment frequency \_\_\_\_\_

Amt on site \_\_\_\_\_ Accumulate/Stored in \_\_\_\_\_

III. Hazardous Waste Units (Note: If more than one of same type, list each one)

TYPE	ACTIVE	CLOSED	WASTES	SIZE/CAPACITY	(D)IKED;(C)ONCRETE/DIR(T)/ (G)RAVEL FLOOR; TYPE OF SECONDARY CONTAINMENT

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V. LIST OF VIOLATIONS: None cited

Section #	Description
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~~21 MAY 1992~~

~~IEPA/DLPC~~

3096B





IV. RELEVANT NOTES OR OBSERVATIONS I arrived at IWI Industries at 10:25 am,  
entered the reception area identified myself and asked to see Mr. Wellman.

I was told by the receptionist that Mr. Wellman had not yet arrived,  
but was expected soon. I asked the receptionist if the emergency coordinator  
was available. The receptionist asked me what did I want to do. I told  
the receptionist that I wanted to conduct a RCRA Inspection. I was then  
told that only Mr. Wellman could admit me into the plant. I asked the  
receptionist to inform Mr. Wellman that I came by and that I would return  
later in the day. When I returned to my automobile, I saw Mr. Wellman  
drive up and enter the facility. I checked the time, it was 10:28 am.  
I then returned to the facility and met with Mr. Glenn Wellman.

Mr. Wellman wanted to know the reason for the visit. I told him  
that it was to conduct an inspection to determine IWI Industries compliance  
with RCRA. Mr. Wellman then asked me what was RCRA. I told him that  
it was standards established for those operation that transport, generate,  
treat or dispose of hazardous wastes.

Mr. Wellman then said that he wanted to cooperate and be in compliance,  
but until he knew where he stood with the litigation with the USEPA,  
he had to follow the advise of his lawyer and not permit an inspection  
or reports to be written.

I thanked Mr. Wellman for his time and left the facility without  
conducting an inspection.

RF:bj:075J

RECEIVED

21 MAY 1991

IEPA/DLPC



Illinois Environmental Protection Agency  
Division of Land Pollution Control  
**NON-NOTIFIER IDENTIFICATION FORM**



DATE: 4 / 21 / 92  
TO: Art Kawatachi, USEPA  
FROM: Michael Walwer, IEPA  
RE: Non-Notifiers

1. Name of Facility: IWI INDUSTRIES  
Facility Mailing Address: 7735 W 61<sup>ST</sup> PLACE  
SUMMIT IL 60501  
City or Town State Zip Code

2. Location of Facility: SAME  
City or Town State Zip Code

3. Facility Contact: GLENN WELLMAN  
Phone Number: 708/458-8700  
Area Code & Number

4. Type of Hazardous Waste Activity if Determined:  
☒ Generation ☐ Transportation  
☒ Treat/Store/Dispose ☐ Underground Injection  
(Circle Applicable Activities)

5. Description of State Follow-Up Action (Including Name of State Assignee, File Data Reviewed, Person(s) Contacted by State, Date(s) and Type of Contact(s), and Information Obtained):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. List of Significant Apparent Violations: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_


7. List of Supporting Documents Attached: 5-7-90 RCRA CET  
\_\_\_\_\_  
\_\_\_\_\_

**TO BE COMPLETED BY USEPA -- (INFORMATION MANAGEMENT SECTION)**

8. Please Fill in USEPA ID Number & Return:

IL \_\_\_\_\_

[7732] 1100717304 1132

		<p>DATE: 5/19/92</p> <p>TO: Art Kawatschi, USEPA</p> <p>FROM: Michael Walwer, IRPA</p> <p>RE: Non-Notifiers</p>	
<p>1. Name of Facility: <u>Two Industries</u></p> <p>Facility Mailing Address: <u>1132 W. 1st Place</u></p> <p>City or Town: <u>Summit</u> State: <u>IL</u> Zip Code: <u>60201</u></p>		<p>2. Location of Facility: <u>Same</u></p> <p>City or Town: _____ State: _____ Zip Code: _____</p>	
<p>3. Facility Contact: <u>Green Weisman</u></p> <p>Phone Number: <u>708/528-8100</u></p> <p>Area Code &amp; Number: _____</p>		<p>4. Type of Hazardous Waste Activity if Determined:</p> <p><input checked="" type="checkbox"/> Generation</p> <p><input checked="" type="checkbox"/> Treatment/Storage/Disposal (Circle Applicable Activities)</p> <p><input type="checkbox"/> Transportation</p> <p><input type="checkbox"/> Underground Injection</p>	
<p>5. Description of State Follow-Up Action (Including Name of State Assigned, File Date Reviewed, Person(s) Contacted by State, Date(s) and Type of Contact(s), and Information Obtained):</p> <p>_____</p> <p>_____</p> <p>_____</p>			
<p>6. List of Significant Apparent Violations:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>			
<p>7. List of Supporting Documents Attached: <u>2-7-90 RCRA LST</u></p> <p>_____</p> <p>_____</p>			
<p>8. TO BE COMPLETED BY USEPA -- (INFORMATION MANAGEMENT SECTION)</p> <p>Please Fill in USEPA ID Number &amp; Return:</p> <p>_____</p>			

NON-NOTIFIER IDENTIFICATION FORM  
Division of Land Pollution Control  
Illinois Environmental Protection Agency

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY  
INSPECTION REPORT

-USEPA Number: *NONE*

IEPA Number:: 0311740003

Facility Name: IWI INDUSTRIES

Street: 7738 W. 41st STREET

City: Summit

Telephone: 458-8700

County: Codick

State: IL

Zip Code: 60501

Type of Facility: Notified as: NON-NOTIFIER Regulated as: G/Stone  
LDF? N HPV? N 90 Day Follow-up required? Yes:      No: ✓

Region: Maywood Date of Inspection: 1-11-89 From: 1:05 to: 1:15  
Weather (LDF Only):

Type of Inspection

ISS:      Sampling:      Citizen Complaint:      Closed:      Other: ✓  
Record Review:      Follow-up to Inspection of:      Withdrawal:     

Non Reguiated Status

SOQ: \_\_\_\_\_ Claimed Nonhandler: \_\_\_\_\_ Other (Specify in Narrative): \_\_\_\_\_

Notification date, *NONE*, from (initial) or (subsequent) Notif.

Part A

Initial Part A date: NONE Ammended:

Part A Withdrawal requested: \_\_\_\_\_ Approved by (US)(IL)EPA: \_\_\_\_\_

Part B Permit Application

Part B Permit called by (US)(IL)EPA on: — Permit Due: —

Part B Permit Submitted: \_\_\_\_\_ Draft Permit Issued: \_\_\_\_\_

## Enforcement

Has the firm been referred to: USEPA? N IAG? Y County SA? Y

Date(s) of initial referral: — 8-17-85 5-3085

USEPA CACO: — CAFO: — ALJ Decision: —

Referral to DOJ by USEPA: \_\_\_\_\_ Federal Court Order Issued: \_\_\_\_\_

PCB Order Issued:            State Court Order Issued: 8-17-85 TR2  
12-10-85 DISCLOSED TR2

## TSD Facility Activity Summary

[illegible]

